

June 16, 2016
Client/Matter No. 8404-0001
Statement No. 530002

Tulio Ruiz
Ruiz Fajardo Ingenieros Asociados, S.A.S.
Calle 104 No. 14A-45
Oficina 304 Centro Empresarial 104
Bogota Colombia

RE: Ruiz Fajardo Ingenieros v. Flow Int'l

INVOICE FOR PROFESSIONAL SERVICES rendered through May 31, 2016:

<u>DATE</u>	<u>TIME KEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/10/2016	NAM	Analyze statute of limitations in light of warranties contained in client's contract, corporate structure of Flow International in light of relevant SEC filings and acquisition by new parent company, and federal court requirements for translation of documents.	1.60	360.00
05/23/2016	JDN	Analyze ramifications of limited remedies failing of their essential purposes and the standard for revocation of acceptance.	0.60	255.00
05/24/2016	JDN	Begin demand letter to Flow.	1.80	765.00
05/27/2016	KNB	Review materials provided by client.	0.30	82.50
05/31/2016	KNB	Continue analyzing status of dispute and next steps needed.	0.50	137.50
05/31/2016	JDN	Work on demand letter to Flow including strategy discussions K. Boling.	1.20	510.00
PROFESSIONAL SERVICES:				<hr/> \$2,110.00

SERVICES SUMMARY

<u>TIME</u> <u>KEEPER</u>	<u>NAME</u>	<u>RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
KNB	Kathryn Naegeli Boling	275.00	0.80	220.00
NAM	Natalie A. Moore	225.00	1.60	360.00
JDN	James D. Nelson	425.00	3.60	1,530.00
TOTAL FOR SERVICES			6.00	\$2,110.00

STATEMENT TOTAL:

\$2,110.00



July 18, 2016
Client/Matter No. 8404-0001
Statement No. 530421

Tulio Ruiz
Ruiz Fajardo Ingenieros Asociados, S.A.S.
Calle 104 No. 14A-45
Oficina 304 Centro Empresarial 104
Bogota Colombia

RE: Ruiz Fajardo Ingenieros v. Flow Int'l

INVOICE FOR PROFESSIONAL SERVICES rendered through June 30, 2016:

<u>DATE</u>	<u>TIME KEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/03/2016	KNB	Assess information needed to be translated and gathered, and email client's attorney M. Ocampo.	0.50	137.50
06/07/2016	KNB	Continue analyzing legal strategy.	2.50	687.50
06/08/2016	KNB	Continue reviewing legal authorities on whether damages limitation clauses are enforceable when limited remedy fails in its essential purpose.	2.80	770.00
06/15/2016	KNB	Research case law outside Washington on failure of a remedy's essential purpose given absence of recent authority in Washington.	0.70	192.50
06/21/2016	KNB	Begin analyzing email from M. Ocampo regarding [REDACTED]	0.10	27.50
06/22/2016	KNB	Strategize further research needed on availability of remedies despite contract clauses.	0.40	110.00
06/22/2016	KNB	Begin research on client question regarding [REDACTED]	0.10	27.50
06/22/2016	JDN	Discuss status, strategy, and further research with K. Boling.	0.60	255.00

06/24/2016	KNB	Analyze additional case law on failure of a limited remedy's essential purpose in Ninth Circuit even under other states' laws.	0.10	27.50
06/27/2016	KNB	Continue researching law on failure of a limited remedy under Washington UCC.	0.20	55.00
06/27/2016	KNB	Research client question regarding [REDACTED] [REDACTED].	1.80	495.00
06/27/2016	KNB	Analyze finance lease between Ruiz Fajardo and Banco de Bogota to see if there are any relevant terms regarding [REDACTED] [REDACTED].	0.10	27.50
06/28/2016	KNB	Finish analysis of client's [REDACTED] [REDACTED].	0.40	110.00
06/28/2016	KNB	Email to M. Ocampo regarding [REDACTED] [REDACTED].	0.20	55.00
06/28/2016	JDN	Analyze the bank lease financing issue.	0.30	127.50
06/30/2016	JDN	Analyze email from M. Ocampo; work on demand letter to Flow.	0.30	127.50

PROFESSIONAL SERVICES:

\$3,232.50

SERVICES SUMMARY

<u>TIME</u> <u>KEEPER</u>	<u>NAME</u>	<u>RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
KNB	Kathryn Naegeli Boling	275.00	9.90	2,722.50
JDN	James D. Nelson	425.00	1.20	510.00
TOTAL FOR SERVICES			<u>11.10</u>	<u>\$3,232.50</u>

COSTS ADVANCED:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
	Photocopies Expense	4.05
TOTAL COSTS ADVANCED:		<u>\$4.05</u>

STATEMENT TOTAL:

\$3,236.55



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August 10, 2016
Client/Matter No. 8404-0001
Statement No. 530628

Tulio Ruiz
Ruiz Fajardo Ingenieros Asociados, S.A.S.
Calle 104 No. 14A-45
Oficina 304 Centro Empresarial 104
Bogota Colombia

RE: Ruiz Fajardo Ingenieros v. Flow Int'l

INVOICE FOR PROFESSIONAL SERVICES rendered through July 31, 2016:

<u>DATE</u>	<u>TIME KEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/07/2016	KNB	Analyze new translation of J. Gomez declaration.	0.30	82.50
07/19/2016	JDN	Draft an annotated statement of facts from the translations.	1.20	510.00
07/20/2016	KNB	Finish reviewing declarations and other documents translated from client.	1.00	275.00
07/20/2016	KNB	Draft statement of facts for demand letter to Flow International.	0.50	137.50
07/20/2016	KNB	Assemble questions for client to clarify facts.	0.90	247.50
07/20/2016	KNB	Email to client M. Ocampo regarding additional questions to clarify facts.	0.10	27.50
07/20/2016	JDN	Draft an annotated statement of facts from the translations.	1.20	510.00
07/21/2016	KNB	Continue writing statement of facts for client review.	1.80	495.00
07/22/2016	KNB	Continue drafting statement of facts for demand letter to Flow.	0.50	137.50
07/22/2016	KNB	Email with client engineer J. Peña regarding additional factual questions.	0.10	27.50
07/25/2016	KNB	Finish drafting statement of facts.	2.20	605.00

07/25/2016	JDN	Revise annotated statement of facts.	1.20	510.00
07/26/2016	KNB	Continue editing draft statement of facts for client review.	1.20	330.00
07/26/2016	KNB	Prepare exhibits to statement of facts.	0.50	137.50
07/26/2016	KNB	Email to client with draft statement of facts for review.	0.10	27.50
07/27/2016	JDN	Draft and revise legal analysis section of demand letter to Flow.	1.20	510.00

PROFESSIONAL SERVICES:

\$4,570.00

SERVICES SUMMARY

<u>TIME</u> <u>KEEPER</u>	<u>NAME</u>	<u>RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
KNB	Kathryn Naegeli Boling	275.00	9.20	2,530.00
JDN	James D. Nelson	425.00	4.80	2,040.00
TOTAL FOR SERVICES			<u>14.00</u>	<u>\$4,570.00</u>

COSTS ADVANCED:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
	Comp Research - Westlaw	33.46
	Photocopies Expense	6.30
TOTAL COSTS ADVANCED:		<u>\$39.76</u>

STATEMENT TOTAL:

\$4,609.76



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September 9, 2016
Client/Matter No. 8404-0001
Statement No. 530947

Tulio Ruiz
Ruiz Fajardo Ingenieros Asociados, S.A.S.
Calle 104 No. 14A-45
Oficina 304 Centro Empresarial 104
Bogota Colombia

RE: Ruiz Fajardo Ingenieros v. Flow Int'l

INVOICE FOR PROFESSIONAL SERVICES rendered through August 31, 2016:

<u>DATE</u>	<u>TIME KEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/02/2016	JDN	Draft and revise legal analysis section of demand letter to Flow.	0.60	255.00
08/04/2016	KNB	Email to client M. Ocampo regarding status of demand letter.	0.40	110.00
08/04/2016	KNB	Begin drafting legal analysis of remedies sought from Flow.	2.70	742.50
08/04/2016	JDN	Analyze email from M. Ocampo; analyze email from K. Boling; work on legal section of letter.	0.60	255.00
08/05/2016	KNB	Finish drafting legal analysis in draft demand letter to Flow.	1.90	522.50
08/05/2016	KNB	Email to client for additional information needed to complete demand letter.	0.10	27.50
08/05/2016	JDN	Draft legal analysis section of demand letter to Flow including strategy discussions with K. Boling.	0.60	255.00
08/08/2016	JDN	Draft legal analysis section of demand letter to Flow.	1.20	510.00
08/09/2016	JDN	Revise legal analysis section of demand letter to Flow.	2.40	1,020.00

08/10/2016	KNB	Review edits to draft demand letter and incorporate new citations needed.	0.40	110.00
08/10/2016	JDN	Revise legal analysis section of demand letter to Flow.	4.80	2,040.00
08/11/2016	KNB	Final double-check to update research concerning failure of limited remedy's essential purpose.	0.80	220.00
08/11/2016	KNB	Final review and edits to letter to clients.	0.30	82.50
08/11/2016	KNB	Email to clients with draft of demand letter.	0.10	27.50
08/11/2016	JDN	Work on finalizing and circulating draft demand letter to Flow including strategy discussions with K. Boling.	2.40	1,020.00
08/12/2016	KNB	Analyze email from client re [REDACTED] [REDACTED]	0.20	55.00
08/12/2016	KNB	Incorporate edits to draft demand letter with new information from client.	0.10	27.50
08/12/2016	KNB	Email clients with new draft of demand letter incorporating new facts from E. Peña.	0.10	27.50
08/12/2016	JDN	Revise draft demand letter to Flow in light of new information received from E. Peña.	0.60	255.00

PROFESSIONAL SERVICES:

\$7,562.50

SERVICES SUMMARY

<u>TIME</u> <u>KEEPER</u>	<u>NAME</u>	<u>RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
KNB	Kathryn Naegeli Boling	275.00	7.10	1,952.50
JDN	James D. Nelson	425.00	13.20	5,610.00
TOTAL FOR SERVICES			<u>20.30</u>	<u>\$7,562.50</u>

COSTS ADVANCED:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
	Comp Research - Westlaw	96.45
	Photocopies Expense	8.25
TOTAL COSTS ADVANCED:		<u>\$104.70</u>

STATEMENT TOTAL:

\$7,667.20



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October 6, 2016
Client/Matter No. 8404-0001
Statement No. 531227

Tulio Ruiz
Ruiz Fajardo Ingenieros Asociados, S.A.S.
Calle 104 No. 14A-45
Oficina 304 Centro Empresarial 104
Bogota Colombia

RE: Ruiz Fajardo Ingenieros v. Flow Int'l

INVOICE FOR PROFESSIONAL SERVICES rendered through September 30, 2016:

<u>DATE</u>	<u>TIME KEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/01/2016	JDN	Strategy discussions with K. Boling.	0.10	42.50
09/19/2016	KNB	Email to clients following up on draft demand letter.	0.10	27.50
09/19/2016	JDN	Strategy discussions with K. Boling.	0.10	42.50
09/20/2016	KNB	Email with client M. Ocampo regarding edits to draft demand letter.	0.20	55.00
09/20/2016	KNB	Revise draft demand letter in light of client feedback.	0.10	27.50
09/20/2016	JDN	Work on finalizing Ruiz Fajardo's demand letter to Flow.	0.30	127.50
09/21/2016	KNB	Analyze new pages of purchase contract provided by client.	0.30	82.50
09/21/2016	KNB	Final edits to demand letter.	0.20	55.00
09/21/2016	JDN	Work on finalizing Ruiz Fajardo's demand letter to Flow including strategy discussions with K. Boling.	0.90	382.50
PROFESSIONAL SERVICES:				<hr/> \$842.50

SERVICES SUMMARY

TIME				
<u>KEEPER</u>	<u>NAME</u>	<u>RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
KNB	Kathryn Naegeli Boling	275.00	0.90	247.50
JDN	James D. Nelson	425.00	1.40	595.00
	TOTAL FOR SERVICES		2.30	\$842.50

COSTS ADVANCED:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
	Comp Research - Westlaw	43.10
	Photocopies Expense	34.20
TOTAL COSTS ADVANCED:		<u>\$77.30</u>

STATEMENT TOTAL:

\$919.80



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November 17, 2016
Client/Matter No. 8404-0001
Statement No. 531633

Tulio Ruiz
Ruiz Fajardo Ingenieros Asociados, S.A.S.
Calle 104 No. 14A-45
Oficina 304 Centro Empresarial 104
Bogota Colombia

RE: Ruiz Fajardo Ingenieros v. Flow Int'l

INVOICE FOR PROFESSIONAL SERVICES rendered through October 31, 2016:

<u>DATE</u>	<u>TIME KEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/14/2016	KNB	Email with client regarding lack of response from Flow.	0.10	27.50
10/17/2016	KNB	Analyze Flow's initial response letter to demand.	0.10	27.50
10/17/2016	JDN	Analyze Flow's response letter; forward response to team; discuss response with K. Boling.	0.30	127.50
10/18/2016	KNB	Analyze case law pertaining to statute of limitations for UCC sales cases for breach of warranty and breach of contract.	0.90	247.50
10/18/2016	KNB	Strategize deadline for filing complaint under statute of limitations.	0.20	55.00
10/18/2016	JDN	Analyze the applicable statute of limitations.	0.30	127.50
10/21/2016	KNB	Email with client regarding [REDACTED]	0.10	27.50
10/21/2016	KNB	Analyze settlement prospects and case strategy.	0.50	137.50
10/21/2016	JDN	Analyze the likelihood of success and the amount of potential damages.	0.50	212.50
10/28/2016	JDN	Preparation for and strategy discussions with M. Ocampo and K. Boling.	0.30	127.50

PROFESSIONAL SERVICES:

\$1,117.50

SERVICES SUMMARY

<u>TIME</u> <u>KEEPER</u>	<u>NAME</u>	<u>RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
KNB	Kathryn Naegeli Boling	275.00	1.90	522.50
JDN	James D. Nelson	425.00	1.40	595.00
TOTAL FOR SERVICES			3.30	\$1,117.50

COSTS ADVANCED:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
	Comp Research - Westlaw	60.52
TOTAL COSTS ADVANCED:		\$60.52

STATEMENT TOTAL:

\$1,178.02

PREVIOUS STATEMENTS OUTSTANDING

<u>STATEMENT</u> <u>NUMBER</u>	<u>DATE</u>	<u>AMOUNT</u> <u>BILLED</u>	<u>LESS</u> <u>PAYMENTS</u>	<u>BALANCE DUE</u>
530002	6/16/16	2,110.00	0.00	2,110.00
530421	7/18/16	3,236.55	0.00	3,236.55
530628	8/10/16	4,609.76	0.00	4,609.76
530947	9/9/16	7,667.20	0.00	7,667.20
531227	10/6/16	919.80	0.00	919.80
		\$18,543.31	\$0.00	\$18,543.31

Trust Balance: \$10,000.00



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December 6, 2016
Client/Matter No. 8404-0001
Statement No. 531802

Tulio Ruiz
Ruiz Fajardo Ingenieros Asociados, S.A.S.
Calle 104 No. 14A-45
Oficina 304 Centro Empresarial 104
Bogota Colombia

RE: Ruiz Fajardo Ingenieros v. Flow Int'l

INVOICE FOR PROFESSIONAL SERVICES rendered through November 30, 2016:

<u>DATE</u>	<u>TIME KEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
11/09/2016	JDN	Emails with M. Ocampo, K. Boling and C. Davis regarding status and strategy.	0.30	127.50
11/14/2016	KNB	Analyze new case regarding failure of essential purpose for waiver of consequential damages in contract.	0.20	55.00
11/30/2016	JDN	Draft complaint.	1.10	467.50
PROFESSIONAL SERVICES:				<u>\$650.00</u>

SERVICES SUMMARY

<u>TIME KEEPER</u>	<u>NAME</u>	<u>RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
KNB	Kathryn Naegeli Boling	275.00	0.20	55.00
JDN	James D. Nelson	425.00	1.40	595.00
TOTAL FOR SERVICES			<u>1.60</u>	<u>\$650.00</u>

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
10/28/2016	Audio Conference Service.	3.30
	Comp Research - Westlaw	30.25
TOTAL COSTS ADVANCED:		<u>\$33.55</u>

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graph BT
    President[President]
    VP[Vice President]
    Controller[Controller]
    Treasurer[Treasurer]
    MS[Manager of Sales]
    MP[Manager of Production]
    MAC[Manager of Accounting]
    MFin[Manager of Finance]
    MInv[Manager of Investments]
    Mkt[Manager of Marketing]
    Ops[Manager of Operations]
    Log[Manager of Logistics]
    MHR[Manager of Human Resources]
    MIS[Manager of Information Systems]
    ML[Manager of Legal Affairs]

    MS --> VP
    MP --> VP
    MAC --> Controller
    MFin --> Controller
    MInv --> Treasurer
    Mkt --> VP
    Ops --> VP
    Log --> VP
    MHR --> VP
    MIS --> VP
    ML --> VP
  
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January 12, 2017
Client/Matter No. 8404-0001
Statement No. 532128

Tulio Ruiz
Ruiz Fajardo Ingenieros Asociados, S.A.S.
Calle 104 No. 14A-45
Oficina 304 Centro Empresarial 104
Bogota Colombia

RE: Ruiz Fajardo Ingenieros v. Flow Int'l

INVOICE FOR PROFESSIONAL SERVICES rendered through December 31, 2016:

<u>DATE</u>	<u>TIME</u> <u>KEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/01/2016	JDN	Email to team; draft complaint.	0.50	212.50
12/05/2016	JDN	Emails with M. Ocampo and T. Ruiz regarding status and strategy.	0.30	127.50
12/05/2016	JDN	Draft complaint.	0.70	297.50
12/08/2016	JDN	Draft complaint.	4.00	1,700.00
12/12/2016	KNB	Final edits to complaint.	0.20	55.00
12/12/2016	JDN	Finalize summons and complaint.	0.30	127.50
12/13/2016	KNB	Finalize summons and complaint.	0.10	27.50
12/13/2016	JDN	Finalize summons and complaint.	1.20	510.00
12/15/2016	KNB	Analyze pleadings from court and assignment of Judge Richard Jones.	0.10	27.50
12/16/2016	KNB	Email clients regarding filing of complaint and next steps.	0.20	55.00
12/16/2016	KNB	Analyze Judge Jones's standing order for civil cases.	0.10	27.50
12/16/2016	JDN	Work on serving Flow and updating client and counsel.	0.30	127.50

12/27/2016	JDN	Call from K. Chatfield of DLA Piper; note to file regarding call; email to M. Ocampo and T. Ruiz regarding call; prepare corporate disclosure statement; forward the same to M. Ocampo to verify.	0.60	255.00
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PROFESSIONAL SERVICES:				<u>\$3,550.00</u>
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SERVICES SUMMARY

<u>TIME</u> <u>KEEPER</u>	<u>NAME</u>	<u>RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
KNB	Kathryn Naegeli Boling	275.00	0.70	192.50
JDN	James D. Nelson	425.00	7.90	3,357.50
	TOTAL FOR SERVICES		<u>8.60</u>	<u>\$3,550.00</u>

COSTS ADVANCED:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
12/21/2016	ABC Legal Services, Inc. for service of process on Flow International Corporation.	74.50
	Comp Research - Westlaw	52.18
	Photocopies Expense	27.00
TOTAL COSTS ADVANCED:		<u>\$153.68</u>

STATEMENT TOTAL:	\$3,703.68
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[REDACTED]				
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		<u>[REDACTED]</u>	<u>[REDACTED]</u>	<u>[REDACTED]</u>
		[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]				

February 7, 2017
Client/Matter No. 8404-0001
Statement No. 532291

Tulio Ruiz
Ruiz Fajardo Ingenieros Asociados, S.A.S.
Calle 104 No. 14A-45
Oficina 304 Centro Empresarial 104
Bogota Colombia

RE: Ruiz Fajardo Ingenieros v. Flow Int'l

INVOICE FOR PROFESSIONAL SERVICES rendered through January 31, 2017:

<u>DATE</u>	<u>TIME KEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/03/2017	JDN	Email to M. Ocampo regarding corporate disclosure statement; email to K. Chatfield regarding extending deadline to answer or move.	0.30	127.50
01/10/2017	JDN	Work on producing Ruiz Fajardo's documents.	0.60	255.00
01/11/2017	KNB	Strategize how best to collect client documents for discovery production.	0.70	192.50
01/11/2017	KNB	Email to clients initiating document gathering for discovery.	0.50	137.50
01/11/2017	SLK	Meet with K. Boling to establish parameters for production of documents from client.	0.60	90.00
01/11/2017	JDN	Work on producing Ruiz Fajardo's documents; call with A. Escobar representing Flow International.	0.30	127.50
01/13/2017	KNB	Continue strategizing how to most efficiently gather relevant documents for lawsuit.	0.40	110.00
01/13/2017	KNB	Draft email to M. Ocampo regarding assistance in gathering documents for litigation.	0.30	82.50
01/17/2017	JDN	Analyze M. Ocampo's email regarding Ruiz Fajardo document production and plan document production accordingly.	0.30	127.50

01/18/2017	KNB	Email with client M. Ocampo regarding discovery document collection.	0.10	27.50
01/19/2017	JDN	Work on producing Ruiz Fajardo's documents including emails with M. Ocampo.	0.30	127.50
01/20/2017	SLK	Conference call with M. Ocampo and J. Nelson regarding production of client documents for review.	0.40	60.00
01/20/2017	JDN	Work on compiling Ruiz Fajardo's document production including conference call with M. Ocampo and S. Kangas, preparation of search terms, and follow-on confirming email.	0.90	382.50
01/23/2017	SRJ	Continue to review case background, discussion with J. Nelson regarding discovery issues.	1.00	275.00
01/23/2017	JDN	Emails with M. Ocampo [REDACTED]	0.30	127.50
01/23/2017	JDN	Plan and prepare for mandatory conference of attorneys, mandatory initial disclosures, and mandatory joint status report.	0.30	127.50
01/25/2017	SRJ	Continue to review case background.	0.40	110.00
01/26/2017	SRJ	Continue to review case background, begin drafting joint status report.	0.80	220.00
01/26/2017	JDN	Draft mandatory joint status report including calls and emails with A. Escobar and note to file.	0.30	127.50
01/26/2017	JDN	Draft search terms for M. Ocampo.	0.30	127.50
01/27/2017	SRJ	Email correspondence from M. Ocampo regarding [REDACTED]	0.40	110.00
01/27/2017	SLK	Analyze file to identify key search terms regarding responsive emails.	2.10	315.00
01/27/2017	NAM	Analyze proposal by Flow's counsel to have Flow's engineers attempt repairs in Colombia with Flow's counsel present.	0.20	45.00
01/27/2017	JDN	Work related to Flow's offer to repair the equipment; work on search terms for RF's document production.	2.40	1,020.00
01/30/2017	SRJ	Review email correspondence regarding Flow offer to fix equipment.	0.20	55.00
01/30/2017	JDN	Analyze Flow's offer to repair including emails with M. Ocampo and strategy discussions with C. Tompkins.	1.40	595.00
01/30/2017	JDN	Draft mandatory joint status report.	0.50	212.50

01/30/2017	CWT	Conference with J. Nelson regarding Flow's proposal to attempt to repair the machinery at issue.	0.40	170.00	Removed
01/31/2017	NAM	Analyze information needed for draft status report and initial disclosures.	0.20	45.00	
01/31/2017	JDN	Analyze Flow's answer to RF's complaint.	1.20	510.00	
01/31/2017	JDN	Work related to Flow's offer to repair the equipment; work on search terms for RF's document production.	0.60	255.00	
				<hr/>	
PROFESSIONAL SERVICES:				\$6,295.00	

SERVICES SUMMARY

<u>TIME</u> <u>KEEPER</u>	<u>NAME</u>	<u>RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
KNB	Kathryn Naegeli Boling	275.00	2.00	550.00
SRJ	Shaina R. Johnson	275.00	2.80	770.00
SLK	Shane L. Kangas	150.00	3.10	465.00
NAM	Natalie A. Moore	225.00	0.40	90.00
JDN	James D. Nelson	425.00	10.00	4,250.00
CWT	Christopher W. Tompkins	425.00	0.40	170.00
TOTAL FOR SERVICES			<hr/> 18.70	<hr/> \$6,295.00

COSTS ADVANCED:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
12/13/2016	Fee to file complaint.	400.00
	Photocopies Expense	11.70
TOTAL COSTS ADVANCED:		<hr/> \$411.70

STATEMENT TOTAL: \$6,706.70

[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]



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March 8, 2017
Client/Matter No. 8404-0001
Statement No. 532664

Tulio Ruiz
Ruiz Fajardo Ingenieros Asociados, S.A.S.
Calle 104 No. 14A-45
Oficina 304 Centro Empresarial 104
Bogota Colombia

RE: Ruiz Fajardo Ingenieros v. Flow Int'l

INVOICE FOR PROFESSIONAL SERVICES rendered through February 28, 2017:

<u>DATE</u>	<u>TIME</u> <u>KEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/01/2017	SRJ	Continue to review case background; continue drafting joint status report; attend Rule 26 conference call with A. Escobar.	2.30	632.50
02/01/2017	JDN	Prepare for and attend mandatory Fed. R. Civ. P. 26(a) conference of attorneys with opposing counsel A. Escobar.	1.00	425.00
02/02/2017	SRJ	Email correspondence from M. Ocampo regarding [REDACTED]	0.50	137.50
02/02/2017	SLK	Prepare spoliation letter to client.	0.60	90.00
02/06/2017	SRJ	Review potential search terms for use in document collection; begin to draft initial disclosures.	0.80	220.00
02/06/2017	NAM	Analyze the search terms proposed for searching client's electronic files and analyze additional possible search terms and methods to retrieve responsive data.	0.40	90.00
02/06/2017	JDN	Draft search terms for gathering RF's electronic documents.	0.60	255.00
02/06/2017	JDN	Draft reminder letter to Ruiz Fajardo regarding document preservation.	0.30	127.50
02/06/2017	JDN	Draft email to A. Escobar on the repair issue.	0.70	297.50

02/06/2017	JDN	Draft RF's mandatory Fed. R. Civ. P. 26(a)(1) initial lay down disclosures.	0.40	170.00
02/07/2017	SRJ	Continue to draft initial disclosures.	1.90	522.50
02/07/2017	JDN	Draft Ruiz Fajardo's mandatory Fed. R. Civ. P. 26(a)(1) initial lay down disclosures.	0.60	255.00
02/08/2017	SRJ	Continue to draft initial disclosures.	0.30	82.50
02/08/2017	JDN	Draft mandatory Fed. R. Civ. P. 26(a)(1) initial lay down disclosures.	0.60	255.00
02/14/2017	SRJ	Revise joint status report; email correspondence with A. Escobar and J. DeGroot regarding same.	0.70	192.50
02/14/2017	JDN	Draft mandatory joint status report and discovery plan.	0.60	255.00
02/15/2017	JDN	Work on mandatory joint status report.	0.60	255.00
02/16/2017	SRJ	Revise joint status report; email correspondence with A. Escobar and J. DeGroot regarding same; call with A. Escobar regarding visit; analysis of document collection issues and issues related to Flow's inspection.	1.20	330.00
02/16/2017	JDN	Finalize mandatory joint status report; discuss inspection with A. Escobar; discuss strategy with S. Johnson; status report to T. Ruiz and M. Ocampo.	0.90	382.50
02/17/2017	JDN	Work on plan for gathering Ruiz Fajardo's documents.	0.10	42.50
02/20/2017	JDN	Numerous emails with M. Ocampo regarding [REDACTED]	0.30	127.50
02/21/2017	SRJ	Email correspondence regarding [REDACTED]	0.40	110.00
02/21/2017	JDN	Preparation for and call with M. Ocampo regarding [REDACTED]	0.60	255.00
02/22/2017	JDN	Plan possible trip to Bogota, Columbia for Flow's inspection of the defective three-dimensional water jet cutting product and related document collection including emails with co-counsel M. Ocampo and opposing counsel A. Escobar.	0.90	382.50
02/23/2017	SRJ	Review and revise search terms and document collection protocols.	1.10	302.50
02/23/2017	NAM	Analyze procedures for assisting client with gathering documents responsive to discovery requests.	0.60	135.00
02/23/2017	JDN	Plan and prepare protocol for inspection; plan and prepare document production; email from J. DeGroot confirming March 27 inspection.	0.30	127.50

02/25/2017	JDN	Work on scheduling inspection including emails with J. DeGroot and M. Ocampo; forward copies of all recent pleadings to T. Ruiz and M. Ocampo; work on finding and retaining an appropriate expert witness; [REDACTED]	1.80	765.00
02/28/2017	JDN	Work on identifying and retaining an expert; work on producing Ruiz Fajardo's documents; work on protocol for expert inspection.	0.50	212.50

PROFESSIONAL SERVICES:

\$7,435.00

SERVICES SUMMARY

<u>TIME</u> <u>KEEPER</u>	<u>NAME</u>	<u>RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
SRJ	Shaina R. Johnson	275.00	9.20	2,530.00
SLK	Shane L. Kangas	150.00	0.60	90.00
NAM	Natalie A. Moore	225.00	1.00	225.00
JDN	James D. Nelson	425.00	10.80	4,590.00
TOTAL FOR SERVICES			<u>21.60</u>	<u>\$7,435.00</u>

COSTS ADVANCED:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
01/20/2017	Fee paid to SoundPath Conferencingm for audio conference service.	2.90
	Photocopies Expense	6.45
TOTAL COSTS ADVANCED:		<u>\$9.35</u>

STATEMENT TOTAL:

\$7,444.35

[REDACTED]				
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

████	████	████	████	████
████	████	████	████	████
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		████	████	████

Trust Balance: \$10,000.00

April 7, 2017
Client/Matter No. 8404-0001
Statement No. 532894

Tulio Ruiz
Ruiz Fajardo Ingenieros Asociados, S.A.S.
Calle 104 No. 14A-45
Oficina 304 Centro Empresarial 104
Bogota Colombia

RE: Ruiz Fajardo Ingenieros v. Flow Int'l

INVOICE FOR PROFESSIONAL SERVICES rendered through March 31, 2017:

<u>DATE</u>	<u>TIME KEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/01/2017	SLK	Begin preparing preliminary instructions to M. Ocampo regarding process of collecting documents and materials related to claim.	0.30	45.00
03/02/2017	SRJ	Continue to work on document collection protocol.	0.80	220.00
03/02/2017	SLK	Continue preparation of preliminary instructions to M. Ocampo regarding process of collecting documents and materials related to claim.	2.40	360.00
03/03/2017	SRJ	Continue to work on document collection protocol.	0.30	82.50
03/03/2017	NAM	Analyze timeline and procedures for responding to anticipated discovery requests.	0.30	67.50
03/04/2017	JDN	Work on inspection and repair.	0.30	127.50
03/06/2017	SRJ	Continue to work on document collection protocol.	0.80	220.00
03/06/2017	NAM	Analyze procedures for collecting discoverable documents from client and draft comprehensive letter explaining those procedures to client.	3.10	697.50
03/06/2017	JDN	Revise letter to Ruiz Fajardo regarding document review protocol; draft letter to Ruiz Fajardo regarding protocol for inspection in Bogota.	0.90	382.50

03/08/2017	SRJ	Discussions with J. Nelson regarding inspection strategy; continue to work on document collection procedure; email correspondence with M. Ocampo regarding same.	0.90	247.50
03/08/2017	NAM	Analyze procedures for obtaining potentially responsive documents from clients.	0.70	157.50
03/08/2017	JDN	Work on inspection and repair; work on document production.	0.60	255.00
03/09/2017	SRJ	Discussions with J. Nelson regarding inspection strategy; continue to work on document collection procedure; email correspondence with M. Ocampo regarding same; begin to research engineer experts.	2.00	550.00
03/09/2017	NAM	Continue analyzing procedures for document collection from clients.	0.30	67.50
03/09/2017	JDN	Work on inspection and repair; work on document production.	0.60	255.00
03/10/2017	SRJ	Discussions with J. Nelson regarding inspection strategy; email correspondence and call with M. Ocampo regarding inspection and document collection strategy; continue to research engineer experts; [REDACTED]	2.70	742.50
03/10/2017	NAM	Analyze next steps needed for document collection procedures for client and call with M. Ocampo.	0.80	180.00
03/10/2017	NAM	Analyze extent to which additional lawsuits filed against Flow may be useful for a potential Consumer Protection Act claim.	0.20	45.00
03/10/2017	NAM	Draft letter to Flow's counsel setting forth parameters for inspection/repair.	1.00	225.00
03/10/2017	NAM	Analyze extent to which client should permit repairs that will bring machine up to lesser standard than contracted for and whether client can/should permit changing of software in machine.	0.70	157.50
03/10/2017	NAM	Analyze case law involving inspections and testing of machines pursuant to discovery rules to determine potential limitations that we could impose on Flow's inspection/repair of the machine.	1.50	337.50

Removed

03/10/2017	JDN	Conference call with M. Ocampo regarding developments, expert, inspection, and document production; search for additional information on Flow's software problem; search for an appropriate expert witness; work on letter opposing counsel about inspection.	1.20	510.00	
03/13/2017	SRJ	Continue to analyze inspection strategy; continue to research engineer experts; and continue to work on document collection procedures.	1.00	275.00	
03/13/2017	NAM	Analyze parameters of Flow's inspection/repair.	0.20	45.00	
03/13/2017	NAM	Letter to Flow regarding inspection parameters.	0.60	135.00	
03/13/2017	NAM	Draft outline of discovery procedures including information provided by client to date.	0.80	180.00	
03/14/2017	SRJ	Call and email correspondence with M. Ocampo regarding visit and inspection protocol; continue to consider inspection procedure issues; continue to search for engineer expert.	1.30	357.50	
03/14/2017	NAM	Analyze extent to which a lesser machine would suffice if Flow cannot make repairs to restore machine to capabilities as contracted for.	0.20	45.00	
03/14/2017	NAM	Call with M. Ocampo.	0.30	67.50	
03/14/2017	NAM	Continue drafting letter to Flow regarding inspection.	0.30	67.50	
03/14/2017	JDN	Strategy discussions about the upcoming Flow inspection/repair; call with M. Ocampo about the upcoming Flow inspection/repair.	0.60	255.00	
03/15/2017	SRJ	Continue to consider inspection procedure issues; continue to search for engineer expert.	0.30	82.50	
03/15/2017	NAM	Analyze complaints filed in other lawsuits against Flow to determine whether Flow has been sued over similar products in the past.	0.20	45.00	Removed
03/16/2017	SRJ	Continue to consider inspection procedure issues; continue to search for engineer expert.	0.60	165.00	
03/16/2017	NAM	Continue analyzing lawsuits filed against Flow to determine whether it has been sued over same product in the past.	0.50	112.50	Removed
03/16/2017	NAM	Revise letter to Flow regarding inspection.	0.20	45.00	
03/16/2017	NAM	Analyze type of expert needed.	0.90	202.50	
03/16/2017	JDN	Strategy discussions and emails regarding inspection, repair, expert, and document production.	0.60	255.00	

03/17/2017	SRJ	Continue to search for water jet engineer and software expert.	1.30	357.50
03/17/2017	NAM	Continue analyzing type of expert needed and researching potential experts and cases in which they have testified.	1.40	315.00
03/17/2017	JDN	Search for an appropriate testifying expert.	1.20	510.00
03/20/2017	SRJ	Continue to search for water jet engineer and software expert; discussions with N. Moore regarding same.	0.70	192.50
03/20/2017	NAM	Identify and analyze qualifications and prior litigation experience of potential experts and contact two potential experts.	4.30	967.50
03/20/2017	JDN	Search for an appropriate testifying expert.	0.60	255.00
03/21/2017	SRJ	Continue to search for water jet engineer and software expert, discussions with N. Moore regarding same.	0.90	247.50
03/21/2017	NAM	Emails with potential experts.	0.30	67.50
03/21/2017	JDN	Search for an appropriate expert witness; email from A. Escobar regarding inspection; strategy discussions with S. Johnson and N. Moore.	0.50	212.50
03/22/2017	SRJ	Continue to search for water jet engineer and software expert; discussions with N. Moore regarding same; email correspondence from A. Escobar regarding inspection.	0.50	137.50
03/22/2017	JDN	Search for an appropriate expert witness; email to M. Ocampo regarding inspection.	0.60	255.00
03/23/2017	SRJ	Continue to search for water jet engineer and software expert; discussions with N. Moore regarding same; review letter from A. Escobar regarding inspection and consider proposed inspection items.	1.20	330.00
03/23/2017	NAM	Emails and calls with potential experts.	2.20	495.00
03/23/2017	NAM	Analyze letter from A. Escobar regarding inspection and email to client regarding same.	0.60	135.00
03/23/2017	JDN	Analyze letter from A. Escobar; search for an expert witness.	0.60	255.00
03/24/2017	SRJ	Continue to search for water jet engineer and software expert; discussions with N. Moore regarding same; email correspondence from M. Ocampo regarding upcoming inspection.	0.90	247.50

03/24/2017	NAM	Emails and calls with potential Flow experts, including D. Tischler and G. Galecki; analyze type of expert testimony needed for case and whether we may need multiple experts.	2.30	517.50	
03/24/2017	NAM	Email to A. Escobar regarding inspection.	0.20	45.00	
03/24/2017	NAM	Analyze other lawsuits in which Flow was a defendant to determine whether it has previously been sued for similar issues with its machines.	1.30	292.50	Removed
03/27/2017	NAM	Continue analyzing whether we want to pull documents from old lawsuits filed against Flow.	0.30	67.50	Removed
03/27/2017	NAM	Continue analyzing potential experts and emails and calls with same.	1.50	337.50	
03/28/2017	SRJ	Email correspondence with M. Ocampo regarding inspection; discussion with N. Moore regarding same.	0.20	55.00	
03/28/2017	NAM	Email to M. Ocampo regarding inspection.	0.10	22.50	
03/29/2017	SRJ	Call with potential expert D. Tischler; review resume and skill description; discussion with J. Nelson and N. Moore regarding expert approach and retention issues.	1.60	440.00	
03/29/2017	NAM	Prepare for call with D. Tischler; call with D. Tischler; [REDACTED]	1.30	292.50	
03/29/2017	JDN	Preparation for and conference call with potential expert D. Tischler.	1.20	510.00	
03/30/2017	SRJ	Email correspondence regarding potential expert Tischler; begin to analyze attorney's fee provision in agreement.	0.50	137.50	
03/30/2017	NAM	Analyze extent to which attorney's fee clause in Flow contract is reciprocal.	0.20	45.00	
03/30/2017	NAM	Analyze uses for D. Tischler as expert and recommendation to Ruiz Fajardo regarding same.	0.40	90.00	
03/31/2017	SRJ	Review new case law regarding a limited remedy that fails of its essential purpose.	0.70	192.50	
03/31/2017	NAM	Analyze new Ninth Circuit case on UCC to determine if applicable to this case.	0.10	22.50	
03/31/2017	NAM	Analyze statutes and case law on reciprocal attorney's fee clauses under Washington law to determine whether clause in this case would be interpreted as reciprocal for any lawsuit brought to enforce the contract.	1.70	382.50	

\$16,697.50

TIME				
<u>KEEPER</u>	<u>NAME</u>	<u>RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
SRJ	Shaina R. Johnson	275.00	19.20	5,280.00
SLK	Shane L. Kangas	150.00	2.70	405.00
NAM	Natalie A. Moore	225.00	31.00	6,975.00
JDN	James D. Nelson	425.00	9.50	4,037.50
	TOTAL FOR SERVICES		62.40	\$16,697.50

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
03/15/2017	Fee paid to Courtrax for transaction searches.	38.60
03/28/2017	Fee paid to Courtrax for transaction searches.	45.00
TOTAL COSTS ADVANCED:		<u>\$83.60</u>

\$16,781.60



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May 12, 2017
Client/Matter No. 8404-0001
Statement No. 533460

Tulio Ruiz
Ruiz Fajardo Ingenieros Asociados, S.A.S.
Calle 104 No. 14A-45
Oficina 304 Centro Empresarial 104
Bogota Colombia

RE: Ruiz Fajardo Ingenieros v. Flow Int'l

INVOICE FOR PROFESSIONAL SERVICES rendered through April 30, 2017:

<u>DATE</u>	<u>TIME</u> <u>KEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/03/2017	SRJ	Email correspondence from M. Ocampo regarding [REDACTED]	0.20	55.00
04/03/2017	JDN	Analyze email from M. Ocampo regarding [REDACTED]	0.30	127.50
04/04/2017	SRJ	[REDACTED]; continue to consider attorney's fee clause issues.	0.50	137.50
04/04/2017	NAM	Analyze whether [REDACTED] draft email to M. Ocampo regarding same.	0.50	112.50
04/06/2017	JDN	Call from A. Escobar reporting on inspection; notes to file and email regarding same.	0.60	255.00
04/07/2017	NAM	Analyze Flow's proposal to fix the machine that would require us to dismiss the case without prejudice.	0.30	67.50
04/10/2017	SRJ	Review email correspondence with M. Ocampo [REDACTED]; discussion with N. Moore regarding terms for retention of expert.	0.60	165.00

04/10/2017	NAM	Email to M. Ocampo regarding expert approval; emails to expert regarding retention, including negotiations regarding travel expenses.	1.10	247.50
04/11/2017	SRJ	Consider possible settlement terms and damages for negotiation; email correspondence from D. Tischler regarding retention terms.	0.70	192.50
04/11/2017	NAM	Analyze possible necessity of expert to calculate damages and proposed response to Flow's request to dismiss the case in exchange for repairing machine.	0.30	67.50
04/11/2017	JDN	Work on terms of engagement of expert D. Tischler; work on strategies and tactics for calculating damages.	0.60	255.00
04/17/2017	SRJ	Review updated D. Tischler retention letter; discussion with J. Nelson and N. Moore regarding next steps and settlement strategy.	0.80	220.00
04/17/2017	NAM	Analyze retention letter from proposed expert and identify needed revisions and analyze next steps in case in light of the fact that we will likely be rejecting Flow's request to dismiss the case, including moving forward with identifying discoverable documents.	1.30	292.50
04/17/2017	JDN	Email to T. Ruiz and M. Ocampo regarding [REDACTED] [REDACTED] discuss documents and experts with S. Johnson and N. Moore.	0.30	127.50
04/18/2017	SRJ	Call with D. Tischler regarding retention letter terms; discussion with J. Nelson and N. Moore regarding damages analysis and settlement strategy.	2.30	632.50
04/18/2017	NAM	Analyze approach to notifying Flow that RF will not agree to dismiss lawsuit but that we are amenable to allowing them to rapair machine.	0.20	45.00
04/18/2017	NAM	Call with D. Tischler regarding his retention letter and emails with him regarding same.	0.50	112.50
04/18/2017	NAM	Analyze possibility of settlement, proof needed to establish damages, extent to which we need to proceed with discovery, strategy for moving case forward if Flow does not agree to repair the machine without us dismissing the case, and extent to which we should agree to arbitration.	1.10	247.50
04/18/2017	JDN	Work on response to Flow's repair proposal; email from M. Ocampo regarding the same; work on retaining expert D. Tischler; confer with S. Johnson and N. Moore.	0.90	382.50

04/19/2017	SRJ	Continue to consider damages analysis and settlement strategy.	0.50	137.50
04/19/2017	NAM	Analyze retention letter from D. Tischler and determine proposed revisions.	0.30	67.50
04/19/2017	JDN	Work on retaining D. Tischler; search for damages expert.	0.30	127.50
04/20/2017	SRJ	Continue to consider damages analysis and settlement strategy; call and email correspondence with M. Ocampo regarding same.	1.10	302.50
04/20/2017	NAM	Finalize retention agreement with D. Tischler; analyze pros and cons of arbitration; analyze proof needed for damages; call with M. Ocampo regarding same.	1.00	225.00
04/20/2017	JDN	Preparation for and conference call with M. Ocampo.	0.30	127.50
04/21/2017	SRJ	Continue to consider damages analysis and settlement strategy; review draft email correspondence to A. Escobar regarding same.	0.30	82.50
04/21/2017	NAM	Analyze email from M. Ocampo and next steps with respect to Flow in light of same.	0.20	45.00
04/24/2017	NAM	Draft letter to D. Tischler regarding his retention; analyze additional work needed to facilitate document collection; email to M. Ocampo regarding same.	0.70	157.50
04/24/2017	JDN	Discuss status and strategy for Ruiz Fajardo's document production with N. Moore; discuss status and strategy for document requests to Flow with N. Moore; work on interrogatories and document requests to Flow.	0.90	382.50
04/25/2017	NAM	Draft discovery requests to Flow.	1.80	405.00
04/26/2017	NAM	Continue drafting discovery requests to Flow.	4.30	967.50

PROFESSIONAL SERVICES:

\$6,770.00

SERVICES SUMMARY

<u>TIME</u> <u>KEEPER</u>	<u>NAME</u>	<u>RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
SRJ	Shaina R. Johnson	275.00	7.00	1,925.00
NAM	Natalie A. Moore	225.00	13.60	3,060.00



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June 7, 2017
Client/Matter No. 8404-0001
Statement No. 533718

Tulio Ruiz
Ruiz Fajardo Ingenieros Asociados, S.A.S.
Calle 104 No. 14A-45
Oficina 304 Centro Empresarial 104
Bogota Colombia

RE: Ruiz Fajardo Ingenieros v. Flow Int'l

INVOICE FOR PROFESSIONAL SERVICES rendered through May 31, 2017:

<u>DATE</u>	<u>TIME</u> <u>KEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/08/2017	JDN	Discuss status of inspection, repair, and document production with S. Johnson and N. Moore.	0.30	127.50
05/15/2017	SRJ	Email correspondence with M. Ocampo regarding case status; discussions with J. Nelson regarding same.	0.50	137.50
05/15/2017	NAM	Analyze prospects for settlement in light of silence from Flow and of court deadlines for discovery requiring action in near future [REDACTED]	0.40	90.00
05/16/2017	SRJ	Email correspondence with M. Ocampo regarding case status; discussions with J. Nelson and N. Moore regarding discovery, damages, and settlement potential.	0.50	137.50
05/16/2017	NAM	Analyze next steps in light of fact that RF has collected requested documents, including need to hire translator and extent to which additional documents need to be provided to expert; analyze [REDACTED]	1.10	247.50

05/16/2017	JDN	Strategy discussions with S. Johnson and N. Moore regarding inspection, document production, liability expert, and damages expert.	0.30	127.50
05/17/2017	SRJ	Discussions with J. Nelson and N. Moore regarding discovery, damages, and settlement potential; call with A. Escobar regarding repair procedure and timeline.	0.50	137.50
05/17/2017	NAM	Call with M. Ocampo and analyze [REDACTED].	0.50	112.50
05/17/2017	JDN	Preparation for and call with opposing counsel A. Escobar; preparation for and call with co-counsel M. Ocampo; work on identifying an appropriate damages expert; strategy discussions with S. Johnson and N. Moore regarding documents and damages.	0.60	255.00
05/22/2017	SRJ	Email correspondence with M. Ocampo regarding [REDACTED].	0.20	55.00
05/22/2017	JDN	Message from A. Escobar about repair; forward the same to T. Ruiz and M. Ocampo; email from T. Ruiz and M. Ocampo; email to A. Escobar regarding the same.	0.30	127.50

PROFESSIONAL SERVICES:

\$1,555.00

SERVICES SUMMARY

<u>TIME</u> <u>KEEPER</u>	<u>NAME</u>	<u>RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
SRJ	Shaina R. Johnson	275.00	1.70	467.50
NAM	Natalie A. Moore	225.00	2.00	450.00
JDN	James D. Nelson	425.00	1.50	637.50
TOTAL FOR SERVICES			<u>5.20</u>	<u>\$1,555.00</u>

COSTS ADVANCED:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
04/20/2017	SoundPath Conferencing fee for teleconferencing.	3.09
TOTAL COSTS ADVANCED:		<u>\$3.09</u>

STATEMENT TOTAL:

\$1,558.09

The diagram illustrates the hierarchical structure of a 3D convolutional layer. It shows the flow from a 3D input volume (10x10x10) through a 3D convolution (3x3x3 kernel) to a 3D feature map (8x8x8), then through a 2D convolution (3x3 kernel) to a 2D feature map (6x6), and finally through a 1D convolution (3x3 kernel) to a 1D output vector (4). The diagram uses color-coding: blue for the input, green for the 3D feature map, yellow for the 2D feature map, and red for the 1D output vector.

July 10, 2017
Client/Matter No. 8404-0001
Statement No. 534068

Tulio Ruiz
Ruiz Fajardo Ingenieros Asociados, S.A.S.
Calle 104 No. 14A-45
Oficina 304 Centro Empresarial 104
Bogota Colombia

RE: Ruiz Fajardo Ingenieros v. Flow Int'l

INVOICE FOR PROFESSIONAL SERVICES rendered through June 30, 2017:

<u>DATE</u>	<u>TIME KEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/12/2017	SRJ	Continue to analyze [REDACTED] [REDACTED].	0.50	137.50
06/12/2017	NAM	Analyze [REDACTED] [REDACTED].	0.30	67.50
06/12/2017	JDN	Discuss getting access to and processing Ruiz Fajardo's documents; analyze [REDACTED] [REDACTED].	0.60	255.00
06/13/2017	NAM	Email to M. Ocampo regarding [REDACTED] [REDACTED].	0.20	45.00
06/14/2017	SRJ	Email correspondence from M. Ocampo regarding [REDACTED] [REDACTED].	0.30	82.50
06/14/2017	JDN	Analyze email from M. Ocampo discussing [REDACTED] [REDACTED].	0.30	127.50
06/15/2017	SLK	Prepare uplink and instructions to client for document retrieval.	0.10	15.00
06/15/2017	NAM	Email to M. Ocampo regarding file transfer.	0.10	22.50

06/19/2017	SRJ	Email correspondence with A. Escobar regarding repair plans.	0.20	55.00
06/19/2017	JDN	Email to A. Escobar following up on the list of issues and proposed solutions he promised to send us before the July 9 repair.	0.10	42.50
06/21/2017	JDN	Review email from A. Escobar regarding the list of issues and proposed solutions he promised to send us before the July 9 repair and forward the same to client.	0.10	42.50
06/23/2017	SRJ	Review list of repairs, and email correspondence with A. Escobar and M. Ocampo regarding same.	0.40	110.00
06/23/2017	NAM	Analyze procedures for machine repair submitted by Flow and evaluate [REDACTED].	0.40	90.00
06/23/2017	JDN	Analyze Flow's proposed scope of repair and forward the same to Ruiz Fajardo; strategy discussions with N. Moore regarding [REDACTED].	0.50	212.50
06/26/2017	SRJ	Discussion with N. Moore regarding [REDACTED].	0.60	165.00
06/26/2017	NAM	Analyze [REDACTED].	0.60	135.00
06/26/2017	JDN	Analyze email from M. Ocampo regarding the import process, the repair, and the document production.	0.10	42.50
06/27/2017	SRJ	Discussion with N. Moore and J. Nelson regarding [REDACTED].	1.20	330.00
06/27/2017	NAM	Continue analyzing [REDACTED] email to M. Ocampo regarding same.	0.90	202.50

06/27/2017	NAM	Analyze [REDACTED] [REDACTED] and strategy for translating documents obtained from client in light of cost considerations. .	0.80	180.00
06/27/2017	JDN	Discuss the need for a continuance.	0.30	127.50
06/28/2017	SRJ	Continued analysis of timelines and if stipulated continuance should be requested given upcoming deadlines.	0.20	55.00
06/28/2017	NAM	Email to A. Escobar regarding extension of deadlines.	0.20	45.00
06/28/2017	JDN	Analyze translation issue; analyze expert issue; [REDACTED]; analyze production issue.	0.60	255.00

PROFESSIONAL SERVICES:

\$2,842.50

SERVICES SUMMARY

<u>TIME</u> <u>KEEPER</u>	<u>NAME</u>	<u>RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
SRJ	Shaina R. Johnson	275.00	3.40	935.00
SLK	Shane L. Kangas	150.00	0.10	15.00
NAM	Natalie A. Moore	225.00	3.50	787.50
JDN	James D. Nelson	425.00	2.60	1,105.00
TOTAL FOR SERVICES			9.60	\$2,842.50

STATEMENT TOTAL:

\$2,842.50

[REDACTED]				
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]			[REDACTED]	[REDACTED]





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August 15, 2017
Client/Matter No. 8404-0001
Statement No. 534480

Tulio Ruiz
Ruiz Fajardo Ingenieros Asociados, S.A.S.
Calle 104 No. 14A-45
Oficina 304 Centro Empresarial 104
Bogota Colombia

RE: Ruiz Fajardo Ingenieros v. Flow Int'l

INVOICE FOR PROFESSIONAL SERVICES rendered through July 31, 2017:

<u>DATE</u>	<u>TIME</u> <u>KEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/05/2017	NAM	Email to M. Ocampo regarding translation and document production.	0.10	22.50
07/05/2017	JDN	Discuss status and strategy with N. Moore; [REDACTED]	0.30	127.50
07/06/2017	SRJ	Continued analysis of [REDACTED]	0.50	137.50
07/06/2017	NAM	Analyze [REDACTED]	0.30	67.50
07/07/2017	SRJ	Continued analysis of [REDACTED]	0.40	110.00
07/07/2017	NAM	Email to A. Escobar and J. DeGroot regarding proposed extension of case deadlines.	0.20	45.00
07/07/2017	NAM	Draft stipulation to extend case deadlines.	1.30	292.50
07/07/2017	JDN	Work on joint motion to continue all trial-related deadlines by six months.	0.30	127.50
07/10/2017	NAM	Email to client [REDACTED] and email to expert regarding his services for calculation of damages.	0.20	45.00

07/10/2017	JDN	Discuss repair with N. Moore; discuss damages with N. Moore; contact potential damages expert.	0.60	255.00
07/11/2017	SLK	Organize incoming documents from client.	0.20	30.00
07/13/2017	SRJ	Begin to review [REDACTED] [REDACTED].	0.30	82.50
07/13/2017	NAM	Review documents from client; analyze [REDACTED] [REDACTED], and email to M. Ocampo. .	1.80	405.00
07/13/2017	JDN	Work on retaining a damages expert; work on reviewing RF documents; work on six month continuance.	0.60	255.00
07/14/2017	SRJ	Email correspondence with J. DeGroot regarding stipulated continuance of trial dates.	0.30	82.50
07/14/2017	NAM	Analyze stipulation for extension of deadlines and analyze requirements for having documents translated in order to be admissible in federal court.	0.90	202.50
07/17/2017	SRJ	Email correspondence with J. DeGroot regarding stipulated continuance of trial dates; email correspondence from M. Ocampo [REDACTED] [REDACTED]; continue to [REDACTED].	0.60	165.00
07/17/2017	NAM	Analyze additional language needed in stipulation for extension of deadlines and emails with Flow's counsel regarding same.	0.30	67.50
07/17/2017	JDN	Work on stipulated motion for a six month continuance; analyze email from M. Ocampo on status of repair.	0.30	127.50
07/18/2017	SRJ	Email correspondence with M. Ocampo regarding translations and document review.	0.20	55.00
07/18/2017	NAM	Revise stipulation for extension of deadlines and email to Flow's counsel regarding same.	0.30	67.50
07/18/2017	NAM	Analyze [REDACTED] [REDACTED]; email to M. Ocampo regarding [REDACTED].	0.30	67.50
07/18/2017	JDN	Analyze status of repair in Columbia; work on six month continuance; work on RF production; work on translations; check expert report deadline; emails with M. Ocampo.	0.60	255.00
07/19/2017	NAM	Revise and finalize stipulation for extension of trial date for filing.	0.20	45.00

07/19/2017	JDN	Finalize and file proposed joint motion for a six-month continuance.	0.30	127.50
07/21/2017	SRJ	Discussion with N. Moore regarding potential damages expert.	0.30	82.50
07/21/2017	NAM	[REDACTED] analyze machine's technical specifications for references to items not repaired by Flow [REDACTED] [REDACTED] analyze [REDACTED] [REDACTED].	1.10	247.50
07/21/2017	JDN	Analyze email from M. Ocampo regarding [REDACTED] [REDACTED].	0.50	212.50
07/24/2017	JDN	Analyze amended case schedule.	0.30	127.50
07/25/2017	SRJ	Discussion with J. Nelson and N. Moore regarding [REDACTED] [REDACTED].	0.80	220.00
07/25/2017	SLK	Prepare second link for document transmittal.	0.10	15.00
07/25/2017	SLK	Organize additional documents from client.	0.20	30.00
07/25/2017	NAM	[REDACTED] [REDACTED]; analyze extent to which expert evaluation of damages is necessary for settlement negotiations and potential challenges to obtaining same, [REDACTED] [REDACTED] [REDACTED]; analyze [REDACTED] [REDACTED] [REDACTED]; [REDACTED] [REDACTED].	2.40	540.00
07/25/2017	JDN	[REDACTED] [REDACTED]; analyze what will be necessary to prove admissible damages.	0.50	212.50
07/31/2017	NAM	Analyze new case addressing Washington's UCC and determine applicability to Flow's potential arguments.	0.60	135.00
07/31/2017	NAM	Review and analyze documents received from client to determine what additional documents may be needed if we proceed to discovery and [REDACTED] [REDACTED].	1.20	270.00

PROFESSIONAL SERVICES:

\$5,357.50

SERVICES SUMMARY

TIME				
<u>KEEPER</u>	<u>NAME</u>	<u>RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
SRJ	Shaina R. Johnson	275.00	3.40	935.00
SLK	Shane L. Kangas	150.00	0.50	75.00
NAM	Natalie A. Moore	225.00	11.20	2,520.00
JDN	James D. Nelson	425.00	4.30	1,827.50
	TOTAL FOR SERVICES		19.40	\$5,357.50

COSTS ADVANCED:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
05/17/2017	SoundPath Conferencing fee for teleconferencing.	3.20
	Photocopies Expense	0.75
TOTAL COSTS ADVANCED:		<u>\$3.95</u>

STATEMENT TOTAL:

\$5,361.45

September 8, 2017
Client/Matter No. 8404-0001
Statement No. 534691

Tulio Ruiz
Ruiz Fajardo Ingenieros Asociados, S.A.S.
Calle 104 No. 14A-45
Oficina 304 Centro Empresarial 104
Bogota Colombia

RE: Ruiz Fajardo Ingenieros v. Flow Int'l

INVOICE FOR PROFESSIONAL SERVICES rendered through August 31, 2017:

<u>DATE</u>	<u>TIME KEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/01/2017	SRJ	Discussions with N. Moore regarding [REDACTED]	0.30	82.50
08/01/2017	NAM	Analyze [REDACTED]	0.30	67.50
08/01/2017	JDN	Analyze Flow's summary of the repairs and request that RF sign off on the repairs.	0.30	127.50
08/02/2017	JDN	Analyze Flow's summary of the repairs and request that RF sign off on the repairs.	0.40	170.00
08/02/2017	JDN	Analyze Flow's summary of the repairs and request that RF sign off on the repairs.	0.30	127.50
08/07/2017	NAM	Review document prepared by client [REDACTED] and analyze settlement-related issues for follow up with M. Ocampo.	0.30	67.50
08/14/2017	SRJ	Discussion with J. Nelson and N. Moore regarding [REDACTED]	0.90	247.50
08/14/2017	NAM	Analyze [REDACTED] email to M. Ocampo regarding same.	0.90	202.50

08/14/2017	JDN	Analyze emails regarding repair, settlement and damages expert.	0.60	255.00
08/15/2017	JDN	Prepare for telephone conference with M. Ocampo.	0.30	127.50
08/17/2017	SRJ	Call with M. Ocampo regarding [REDACTED], discussions with N. Moore and J. Nelson regarding same.	0.70	192.50
08/17/2017	NAM	Call with M. Ocampo and analyze strategy for [REDACTED].	0.90	202.50
08/17/2017	JDN	Prepare for conference call with M. Ocampo; attend conference call with M. Ocampo; post-call strategy discussions with S. Johnson and N. Moore; work on annotations to Flow's repair spreadsheet; work on initial budget for damages expert D. Solis.	0.90	382.50
08/21/2017	SRJ	Discussions with N. Moore regarding expert review of key documents for purposes of estimate.	0.40	110.00
08/21/2017	NAM	Call with expert regarding damages calculations.	0.10	22.50
08/21/2017	JDN	Work on response to Flow's repair spreadsheet and proposed damages expert budget including strategy discussions with S. Johnson and N. Moore.	0.30	127.50
08/22/2017	NAM	Analyze [REDACTED].	0.70	157.50
08/24/2017	SRJ	Continue to review [REDACTED].	0.60	165.00
08/24/2017	NAM	Analyze [REDACTED], analyze contract and related materials [REDACTED], and begin drafting response to Flow regarding same.	2.00	450.00
08/25/2017	SRJ	Continue to consider [REDACTED], email correspondence with M. Ocampo regarding same.	1.00	275.00
08/25/2017	SRJ	Call with D. Solis regarding estimate for expert review of damages analysis.	0.40	110.00
08/25/2017	JDN	Work with S. Johnson on damages expert's proposed budget.	0.10	42.50
08/28/2017	SRJ	Continue to consider [REDACTED], discussion with N. Moore regarding same.	0.30	82.50



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October 4, 2017
Client/Matter No. 8404-0001
Statement No. 534818

Tulio Ruiz
Ruiz Fajardo Ingenieros Asociados, S.A.S.
Calle 104 No. 14A-45
Oficina 304 Centro Empresarial 104
Bogota Colombia

RE: Ruiz Fajardo Ingenieros v. Flow Int'l

INVOICE FOR PROFESSIONAL SERVICES rendered through September 30, 2017:

<u>DATE</u>	<u>TIME</u> <u>KEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/15/2017	SRJ	Discussions with J. Nelson regarding repair chart review issues outstanding.	0.30	82.50
09/15/2017	JDN	Discuss status strategy with S. Johnson; analyze strategy options going forward.	0.20	85.00
09/20/2017	SRJ	Review [REDACTED] [REDACTED].	0.50	137.50
09/20/2017	NAM	Analyze action needed in response to email from M. Ocampo.	0.40	90.00
09/21/2017	SRJ	Review [REDACTED] [REDACTED].	0.30	82.50
09/21/2017	NAM	Continue analyzing contract for machine [REDACTED] [REDACTED] and draft memorandum regarding same.	1.60	360.00
09/27/2017	NAM	Analyze timing for gathering documents from client in light of expert report deadlines and discovery cutoff. .	0.30	67.50
09/28/2017	SRJ	Discussion with J. Nelson regarding case status.	0.30	82.50

PROFESSIONAL SERVICES:

\$987.50

SERVICES SUMMARY

<u>TIME</u> <u>KEEPER</u>	<u>NAME</u>	<u>RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
SRJ	Shaina R. Johnson	275.00	1.40	385.00
NAM	Natalie A. Moore	225.00	2.30	517.50
JDN	James D. Nelson	425.00	0.20	85.00
TOTAL FOR SERVICES			3.90	\$987.50

STATEMENT TOTAL:

\$987.50

December 6, 2017
Client/Matter No. 8404-0001
Statement No. 535726

Tulio Ruiz
Ruiz Fajardo Ingenieros Asociados, S.A.S.
Calle 104 No. 14A-45
Oficina 304 Centro Empresarial 104
Bogota Colombia

RE: Ruiz Fajardo Ingenieros v. Flow Int'l

INVOICE FOR PROFESSIONAL SERVICES rendered through November 30, 2017:

<u>DATE</u>	<u>TIME KEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
11/01/2017	JDN	Emails with M. Ocampo regarding status and strategy.	0.30	127.50
11/08/2017	SRJ	Discussion with J. Nelson regarding case status.	0.40	110.00
11/08/2017	NAM	Analyze timing for discovery and expert preparation in light of upcoming deadlines.	0.20	45.00
11/08/2017	JDN	Work on document production; work on damages expert; work on liability expert; strategy discussions.	0.60	255.00
11/10/2017	SRJ	Email correspondence with expert D. Tischler regarding case status.	0.20	55.00
11/10/2017	NAM	Email to expert regarding case status. .	0.20	45.00
11/17/2017	JDN	Discuss [REDACTED] [REDACTED] with M. Ocampo.	0.30	127.50
11/28/2017	NAM	Prepare for call with A. Escobar regarding case status and analyze preparation needed for trial.	0.40	90.00
11/28/2017	JDN	Email from A. Escobar requesting conference; strategy discussions with team; email to A. Escobar suggesting dates.	0.30	127.50

11/29/2017	NAM	Call with A. Escobar regarding mediation and machine performance and email to M. Ocampo regarding same.	0.40	90.00
11/29/2017	JDN	Prepare for and attend status conference call requested by A. Escobar and J. DeGroot; work on email to T. Ruiz and M. Ocampo regarding [REDACTED]	0.60	255.00
11/30/2017	JDN	Analyze email from M. Ocampo; discuss forensic accountant, settlement, status, and strategy with N. Moore.	0.60	255.00

PROFESSIONAL SERVICES:

\$1,582.50

SERVICES SUMMARY

<u>TIME KEEPER</u>	<u>NAME</u>	<u>RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
SRJ	Shaina R. Johnson	275.00	0.60	165.00
NAM	Natalie A. Moore	225.00	1.20	270.00
JDN	James D. Nelson	425.00	2.70	1,147.50
TOTAL FOR SERVICES			<u>4.50</u>	<u>\$1,582.50</u>

COSTS ADVANCED:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
10/04/2017	SoundPath Conferencing readyconference plus audio for Natalie Moore.	10.14
10/04/2017	SoundPath Conferencing.	9.15
TOTAL COSTS ADVANCED:		<u>\$19.29</u>

STATEMENT TOTAL:

\$1,601.79

[REDACTED]					
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

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January 10, 2018
Client/Matter No. 8404-0001
Statement No. 536060

Tulio Ruiz
Ruiz Fajardo Ingenieros Asociados, S.A.S.
Calle 104 No. 14A-45
Oficina 304 Centro Empresarial 104
Bogota Colombia

RE: Ruiz Fajardo Ingenieros v. Flow Int'l

INVOICE FOR PROFESSIONAL SERVICES rendered through December 31, 2017:

<u>DATE</u>	<u>TIME</u> <u>KEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/05/2017	SRJ	Discussion with J. Nelson regarding information for expert D. Solis.	0.40	110.00
12/05/2017	JDN	Work on email to A. Escobar regarding status of machine and settlement.	0.30	127.50
12/19/2017	SRJ	Discussion with J. Nelson and N. Moore regarding expert and case status.	0.30	82.50
12/19/2017	NAM	Analyze additional discovery needed and timeline for same given approaching expert disclosure deadlines.	0.20	45.00
12/27/2017	SRJ	Discussion with J. Nelson regarding case status and next steps.	0.50	137.50
12/29/2017	SRJ	Continue to consider [REDACTED]	0.30	82.50
PROFESSIONAL SERVICES:				<hr/> \$585.00

SERVICES SUMMARY

<u>TIME</u> <u>KEEPER</u>	<u>NAME</u>	<u>RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
SRJ	Shaina R. Johnson	275.00	1.50	412.50
NAM	Natalie A. Moore	225.00	0.20	45.00
JDN	James D. Nelson	425.00	0.30	127.50
TOTAL FOR SERVICES			2.00	\$585.00

STATEMENT TOTAL:

\$585.00

February 8, 2018
Client/Matter No. 8404-0001
Statement No. 536383

Tulio Ruiz
Ruiz Fajardo Ingenieros Asociados, S.A.S.
Calle 104 No. 14A-45
Oficina 304 Centro Empresarial 104
Bogota Colombia

RE: Ruiz Fajardo Ingenieros v. Flow Int'l

INVOICE FOR PROFESSIONAL SERVICES rendered through January 31, 2018:

<u>DATE</u>	<u>TIME KEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/01/2018	NAM	Analyze [REDACTED] [REDACTED] email to client regarding same.	1.10	247.50
01/01/2018	JDN	Work on document production; work on liability expert report; work on damages expert report.	0.60	255.00
01/02/2018	NAM	Continue analyzing [REDACTED] [REDACTED].	0.30	67.50
01/02/2018	JDN	Work on getting needed documents from Ruiz Fajardo.	0.60	255.00
01/03/2018	NAM	Analyze materials needed for economic expert and email to expert regarding same.	0.60	135.00
01/03/2018	JDN	Analyze email from M. Ocampo; work on document production; work on damages expert.	0.50	212.50
01/04/2018	SRJ	Discussion with N. Moore regarding expert report issues; review email correspondence with D. Solis regarding [REDACTED].	0.50	137.50
01/04/2018	JDN	Discuss [REDACTED] with N. Moore and schedule a meeting with damages expert D. Solis.	0.60	255.00

01/10/2018	SRJ	Review [REDACTED]; attend meeting with D. Solis; discussions with J. Nelson and N. Moore regarding same.	1.70	467.50
01/10/2018	NAM	Prepare for and attend meeting with damages expert.	1.50	337.50
01/10/2018	JDN	Prepare to meet with damages expert D. Solis; meet with damages expert D. Solis; post-meeting strategy discussions.	1.20	510.00
01/11/2018	SRJ	Review letter from D. Solis regarding documents; email correspondence with M. Ocampo regarding same.	0.50	137.50
01/22/2018	SRJ	Begin to review documents from Ruiz Fajardo; email correspondence with M. Ocampo regarding same and translation.	0.70	192.50
01/22/2018	JDN	Analyze emails from M. Ocampo [REDACTED] including strategy discussions with S. Johnson.	0.30	127.50
01/23/2018	JDN	Discuss document review and translations with N. Moore.	0.30	127.50
01/31/2018	SRJ	Discussion with J. Nelson and N. Moore regarding translation of documents, expert report, and potential for settlement.	0.50	137.50
01/31/2018	NAM	Analyze translation issues, [REDACTED].	0.50	112.50
01/31/2018	JDN	Work on translations; work on discovery requests; work on experts; strategy discussions.	0.60	255.00

PROFESSIONAL SERVICES:

\$3,970.00

SERVICES SUMMARY

<u>TIME</u> <u>KEEPER</u>	<u>NAME</u>	<u>RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
SRJ	Shaina R. Johnson	275.00	3.90	1,072.50
NAM	Natalie A. Moore	225.00	4.00	900.00
JDN	James D. Nelson	425.00	4.70	1,997.50
TOTAL FOR SERVICES			12.60	\$3,970.00

COSTS ADVANCED:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
	Color Document Production	23.00
TOTAL COSTS ADVANCED:		<u>\$23.00</u>

STATEMENT TOTAL:

\$3,993.00

The diagram illustrates a relationship between two sets of 1000 elements each. On the left, there is a vertical column of 1000 points, represented by small black squares. On the right, there is a vertical column of 1000 lines, represented by horizontal black bars. A central area contains a grid of connections between these points and lines. The connections are most dense in the center, forming a large, dark, irregular shape. This shape has a horizontal line passing through its middle, and a vertical line passing through its center. The overall effect is a complex, interconnected network of points and lines, suggesting a high degree of connectivity or a complex system.



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March 6, 2018
Client/Matter No. 8404-0001
Statement No. 536705

Tulio Ruiz
Ruiz Fajardo Ingenieros Asociados, S.A.S.
Calle 104 No. 14A-45
Oficina 304 Centro Empresarial 104
Bogota Colombia

RE: Ruiz Fajardo Ingenieros v. Flow Int'l

INVOICE FOR PROFESSIONAL SERVICES rendered through February 28, 2018:

<u>DATE</u>	<u>TIME</u> <u>KEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/01/2018	JDN	Analyze forensic economist D. Solis's January invoice; work on interrogatories and document requests.	0.30	127.50
02/02/2018	SRJ	Email correspondence with M. Ocampo regarding [REDACTED], discussions with J. Nelson and N. Moore regarding same, continue to review documents to attempt to determine what other information we need.	2.20	605.00
02/02/2018	JDN	Email to M. Ocampo regarding [REDACTED].	0.30	127.50
02/05/2018	SRJ	Email correspondence with M. Ocampo regarding [REDACTED], discussions with J. Nelson regarding same, continue to review documents [REDACTED].	1.90	522.50
02/05/2018	JDN	Work on damages' expert's report; work on liability expert's report; work on needed translations.	2.40	1,020.00

02/06/2018	SRJ	Email correspondence with M. Ocampo regarding [REDACTED], discussions with J. Nelson and N. Moore regarding same, continue to review documents to attempt to determine what other information we need and to prepare settlement demand.	4.60	1,265.00
02/06/2018	NAM	Analyze needed trial preparation including potential discovery requests, expert reports, and documents we need to send to experts.	1.70	382.50
02/06/2018	NAM	Review documents to be sent to translator.	1.20	270.00
02/06/2018	NAM	Review and identify documents to send to D. Tischler and emails to D. Tischler regarding same.	1.50	337.50
02/06/2018	JDN	Analyze [REDACTED]; discuss needed translations with S. Johnson; discuss expert D. Tischler's report with N. Moore; work on settlement demand to Flow.	1.80	765.00
02/07/2018	SRJ	Continue to review documents to attempt to determine what other information we need and to prepare settlement demand, continue to work on translation issue.	0.60	165.00
02/07/2018	SLK	Classify and organize relevant documents into reference notebooks.	0.60	90.00
02/07/2018	NAM	Analyze document review and translations.	0.20	45.00
02/07/2018	JDN	Study chronological documents file to assist with expert reports.	0.70	297.50
02/08/2018	SRJ	Continue to review documents in order to prepare settlement demand, continue to work on translation issue.	1.80	495.00
02/08/2018	SLK	Research translators capable of creating transcriptions of technical documents and language.	0.70	105.00
02/08/2018	SLK	Submit work examples for quotes to compare potential translator services.	0.30	45.00
02/08/2018	NAM	Analyze [REDACTED].	0.60	135.00
02/08/2018	JDN	Work on liability expert D. Tischler's report including strategy emails with N. Moore.	1.10	467.50
02/09/2018	SRJ	Continue to review documents in order to prepare settlement demand, continue to work on settlement demand letter.	1.80	495.00
02/12/2018	SRJ	Continue to review documents in order to prepare settlement demand, continue to work on settlement demand letter.	4.50	1,237.50

02/13/2018	SRJ	Continue to work on settlement demand letter, discussions with N. Moore and J. Nelson regarding same.	1.40	385.00	
02/13/2018	SLK	Review and summarize quotes received in response to requests for estimates for translation services.	0.20	30.00	
02/13/2018	SLK	Organize and convert January 2018 subfolder documents into pdfs by topic and submit to translation service, and complete initial project form.	0.90	135.00	
02/13/2018	NAM	Analyze damages calculations for settlement letter.	1.20	270.00	
02/13/2018	JDN	Work on demand letter to Flow; strategy discussions with S. Johnson.	1.20	510.00	
02/14/2018	SRJ	Continue to work on settlement demand letter, discussions with N. Moore and J. Nelson regarding same, email correspondence with D. Solis regarding damages analysis.	3.00	825.00	
02/14/2018	SLK	Prepare imaging for submittal to expert D. Tischler.	0.20	30.00	
02/14/2018	SLK	Emails with support at The WordPoint regarding service request and details.	0.10	15.00	
02/14/2018	NAM	Analyze damages available in rescission calculation.	0.90	202.50	Removed
02/14/2018	JDN	Work on settlement-related letter to Flow; consider [REDACTED]; strategy discussions with S. Johnson and N. Moore.	2.40	1,020.00	
02/15/2018	SRJ	Continue to work on settlement demand letter, discussions with N. Moore and J. Nelson regarding same, email correspondence with D. Solis regarding damages analysis, email correspondence with M. Ocampo regarding same.	2.70	742.50	
02/15/2018	SLK	Further emails with support at The WordPoint regarding service request and deadlines.	0.10	15.00	
02/15/2018	NAM	Analyze mediation email from Flow's counsel and send response and continue analyzing damages calculations for demand letter.	1.60	360.00	
02/15/2018	JDN	Work on demand letter to Flow; work on document requests to Flow; work on identifying Flow deponents; emails with J. DeGroot regarding mediation; internal strategy discussions.	2.50	1,062.50	
02/16/2018	SRJ	Continue to work on translation of key documents and expert reports of D. Solis and D. Tischler.	0.70	192.50	
02/16/2018	SLK	Receive and download project results from The WordPoint.	0.10	15.00	

02/16/2018	NAM	Analyze notice required for revocation of acceptance, draft discovery requests; analyze desired contents of D. Tischler's report.	4.10	922.50	Removed Half
02/19/2018	NAM	Analyze [REDACTED].	2.40	540.00	
02/19/2018	JDN	Analyze email from M. Ocampo following up on status of proposed demand letter to Flow; analyze email from liability expert D. Tischler about telephone conference on Tuesday; meeting with N. Moore to plan Tuesday's conference call with D. Tischler about his report.	0.60	255.00	
02/20/2018	NAM	Analyze [REDACTED].	6.00	1,350.00	
02/20/2018	NAM	Call with D. Tischler regarding report and prepare for and analyze same.	1.00	225.00	
02/20/2018	JDN	Prepare for conference call with liability expert D. Tischler; attend call with liability expert D. Tischler and N. Moore.	1.20	510.00	
02/21/2018	SRJ	Continue to work on translation of key documents and expert reports of D. Solis and D. Tischler, discussions with N. Moore regarding same.	1.60	440.00	
02/21/2018	SLK	Meeting with S. Johnson and N. Moore to discuss project results.	0.20	30.00	
02/21/2018	SLK	Email to support at The WordPoint regarding project results, certification, and next project.	0.10	15.00	
02/21/2018	NAM	Review translations and draft email to translator regarding same and email to D. Tischler regarding draft report.	1.60	360.00	
02/21/2018	NAM	Analyze index sent by M. Ocampo and determine whether it is what we need to determine which documents to translate, evaluate content [REDACTED] and analyze additional documents to send to D. Solis.	0.90	202.50	
02/22/2018	SRJ	Continue to work on translation of key documents and expert reports of D. Solis and D. Tischler, discussions with N. Moore regarding same, email correspondence with M. Ocampo regarding demand letter, continue to work on demand letter.	1.90	522.50	
02/22/2018	SLK	Analyze and compare remaining documents to remove duplicates and duplicate email threads to prepare for submittal to translation service.	6.60	990.00	
02/22/2018	NAM	Email to D. Solis regarding documents and report.	0.40	90.00	

02/22/2018	NAM	Review translated documents, review index for translated documents provided by M. Ocampo and email to M. Ocampo regarding same and demand letter, and review and analyze M. Ocampo's comments on demand letter.	1.50	337.50
02/22/2018	JDN	Analyze M. Ocampo and T. Ruiz's [REDACTED] [REDACTED].	0.60	255.00
02/23/2018	SLK	Summary email to The WordPoint regarding new project details and deadlines.	0.20	30.00
02/23/2018	SLK	Emails with V. Sukhetska at The WordPoint regarding submittal of initial project to quality assurance and questions regarding submittal of new project.	0.20	30.00
02/23/2018	JDN	Work on liability expert report; work on damages expert report; work on settlement demand letter.	0.90	382.50
02/26/2018	SRJ	Continue to work on translation of key documents and expert reports of D. Solis and D. Tischler, discussions with N. Moore regarding same.	0.40	110.00
02/26/2018	SLK	Email to support at The WordPoint regarding transcription certification.	0.10	15.00
02/26/2018	SLK	Email to V. Sukhetska with hyperlink to new project documents and emails.	0.10	15.00
02/26/2018	NAM	Analyze translations.	0.30	67.50
02/27/2018	SRJ	Continue to work on translation of key documents and expert reports of D. Solis and D. Tischler, discussions with N. Moore regarding same, email correspondence with M. Ocampo regarding [REDACTED].	0.70	192.50
02/27/2018	SLK	Reformat folder structure and prepare an additional link to records for translation.	0.20	30.00
02/27/2018	JDN	Work on settlement demand letter; work on arranging translations; work with damages expert.	0.60	255.00
02/28/2018	SRJ	Continue to work on translation of key documents and expert reports of D. Solis and D. Tischler, discussions with N. Moore and J. Nelson regarding same, email correspondence with M. Ocampo regarding settlement demand letter and documents needed for expert reports, phone calls with D. Solis regarding information needed for his report.	3.70	1,017.50
02/28/2018	SLK	Multiple emails with V. Sukhetska re problems with submittal of documents and payment.	0.40	60.00

02/28/2018	NAM	Analyze additional information needed by D. Tischler for report and email to client regarding same and analyze ER 408 issues related to presenting evidence of repairs.	1.90	427.50
02/28/2018	NAM	Call with D. Solis regarding additional information needed for damages calculation and analyze same.	0.40	90.00
02/28/2018	NAM	Analyze email from D. Solis requesting additional information from client and email to client regarding same.	1.20	270.00
02/28/2018	NAM	Revise D. Tischler's report outline in light of ER 408 considerations and email to D. Tischler regarding same.	0.90	202.50
02/28/2018	JDN	Work on liability expert D. Tischler's report; work on damages expert D. Solis's report; work on demand letter to Flow; analyze emails from M. Ocampo; prepare detailed email to M. Ocampo.	1.20	510.00

PROFESSIONAL SERVICES:

\$25,560.00

SERVICES SUMMARY

<u>TIME KEEPER</u>	<u>NAME</u>	<u>RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
SRJ	Shaina R. Johnson	275.00	33.50	9,212.50
SLK	Shane L. Kangas	150.00	11.30	1,695.00
NAM	Natalie A. Moore	225.00	31.50	7,087.50
JDN	James D. Nelson	425.00	17.80	7,565.00
TOTAL FOR SERVICES			<u>94.10</u>	<u>\$25,560.00</u>

COSTS ADVANCED:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
02/09/2018	Solis Financial Forensics 8404-0001 Financial Forensics Expert D. Solis Professional Services.	1,387.50
	Color Document Production	8.50
	Photocopies Expense	33.00
TOTAL COSTS ADVANCED:		<u>\$1,429.00</u>



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April 11, 2018
Client/Matter No. 8404-0001
Statement No. 537067

Tulio Ruiz
Ruiz Fajardo Ingenieros Asociados, S.A.S.
Calle 104 No. 14A-45
Oficina 304 Centro Empresarial 104
Bogota Colombia

RE: Ruiz Fajardo Ingenieros v. Flow Int'l
Claim No.:

INVOICE FOR PROFESSIONAL SERVICES rendered through March 31, 2018:

<u>DATE</u>	<u>TIME</u> <u>KEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/01/2018	SRJ	Continue to work on translation of key documents and expert reports of D. Solis and D. Tischler; discussions with N. Moore regarding same; email correspondence with D. Tischler regarding same.	0.70	192.50
03/01/2018	SLK	Emails with V. Sukhetska verifying payment of project fees.	0.30	45.00
03/02/2018	SRJ	Continue to work on reports of D. Solis and D. Tischler; discussions with N. Moore and J. Nelson regarding same; email correspondence with M. Ocampo regarding same.	0.60	165.00
03/02/2018	NAM	Analyze outstanding information needed from Ruiz Fajardo and email to M. Ocampo regarding same.	0.60	135.00
03/02/2018	JDN	[REDACTED]; work on demand letter; strategy emails with M. Ocampo.	1.20	510.00
03/05/2018	SRJ	[REDACTED]; discussions with N. Moore regarding same; email correspondence with M. Ocampo regarding outstanding items.	1.50	412.50

03/05/2018	SLK	Respond to translator's questions regarding project submitted through The Word Point portal.	0.10	15.00
03/05/2018	NAM	Review D. Tischler's draft report and email to D. Tischler regarding same.	0.50	112.50
03/05/2018	NAM	Prepare for call with M. Ocampo regarding [REDACTED]	0.50	112.50
03/05/2018	JDN	[REDACTED]; emails with M. Ocampo; discussion with A. Escobar.	1.00	425.00
03/06/2018	SRJ	[REDACTED]; discussions with N. Moore regarding same, email correspondence and call with M. Ocampo regarding outstanding items; revise and finalize demand letter; send demand letter to opposing counsel.	2.10	577.50
03/06/2018	NAM	Prepare for call with M. Ocampo; call with M. Ocampo; email to D. Tischler regarding additional information needed from client; emails to M. Ocampo and D. Solis regarding follow-up conference call.	1.90	427.50
03/06/2018	NAM	Continue analyzing information needed for experts.	0.60	135.00
03/06/2018	JDN	[REDACTED] strategy call with M. Ocampo; finalize settlement demand to Flow.	1.80	765.00
03/07/2018	SRJ	[REDACTED]; discussions with N. Moore and J. Nelson regarding same; email correspondence and call with M. Ocampo and D. Solis regarding outstanding items.	1.60	440.00
03/07/2018	NAM	Continue analyzing documents received from client for experts and evaluate what additional documents are needed.	0.30	67.50
03/07/2018	NAM	Call with D. Solis regarding additional documents needed.	0.10	22.50
03/07/2018	JDN	Work on settlement scenarios; [REDACTED]; conference call with M. Ocampo.	1.50	637.50
03/08/2018	SRJ	[REDACTED]; discussions with N. Moore and J. Nelson regarding same; email correspondence and call with M. Ocampo and D. Solis regarding outstanding items; work on translations of new documents.	3.00	825.00

03/08/2018	SLK	Continuous coordination of translation project including responding to emails, organizing incoming documents, payment submittal, responding to questions, preparing additional documents, and checking for quality.	1.80	270.00
03/08/2018	NAM	Continue analyzing documents received from client in light of requests for same from D. Solis and emails with M. Ocampo regarding same.	2.50	562.50
03/08/2018	NAM	Analyze proper language for declaration regarding translation and draft same.	1.00	225.00
03/08/2018	JDN	Analyze new Ruiz Fajardo financial data forwarded by M. Ocampo and continue to work on damages report.	1.20	510.00
03/09/2018	SRJ	[REDACTED]; discussions with N. Moore and J. Nelson regarding same; email correspondence with M. Ocampo and D. Solis regarding outstanding items; work on translation of new documents.	1.10	302.50
03/09/2018	SLK	Continuous coordination of translation project including responding to emails, organizing incoming documents, payment submittal, responding to questions, preparing additional documents, and checking for quality.	0.30	45.00
03/09/2018	SLK	Email to support at The Word Point regarding declarations for translators.	0.30	45.00
03/09/2018	NAM	Review translations for accuracy and determine whether costs of translating financial records are appropriate.	0.40	90.00
03/09/2018	JDN	Work on damages [REDACTED].	1.30	552.50
03/12/2018	SRJ	[REDACTED]; discussions with N. Moore and J. Nelson regarding same; email correspondence with M. Ocampo and D. Solis regarding outstanding items; work on translation of new documents.	0.60	165.00
03/12/2018	NAM	Analyze follow up for client in order to complete expert reports on time.	0.20	45.00
03/12/2018	NAM	Email to M. Ocampo and D. Tischler regarding [REDACTED].	0.30	67.50
03/12/2018	JDN	Work on damages [REDACTED].	1.20	510.00

03/13/2018	SRJ	[REDACTED]; discussions with N. Moore and J. Nelson regarding same; email correspondence with M. Ocampo and D. Solis regarding outstanding items; work on translation of documents.	1.70	467.50
03/13/2018	SLK	Revise translator declaration to incorporate information provided by support team and add section for entry of documents and/or folder lists.	0.20	30.00
03/13/2018	SLK	Continue coordination of translation project regarding responding to emails, organizing incoming documents, payment submittal, responding to questions, preparing additional documents, and checking for quality.	0.30	45.00
03/13/2018	NAM	Analyze additional work from experts and documents needed.	0.60	135.00
03/13/2018	NAM	Review D. Tischler's draft report [REDACTED] [REDACTED].	1.30	292.50
03/13/2018	NAM	Review documents provided by client in response to requests from D. Solis and evaluate additional materials needed.	1.10	247.50
03/13/2018	NAM	Call with D. Tischler regarding report; [REDACTED] [REDACTED]; analyze settlement potential in light of meeting with plaintiff's counsel regarding same.	1.50	337.50
03/13/2018	NAM	Call with D. Tischler, M. Ocampo, and T. Ruiz regarding D. Tischler's questions about machine and repairs for report.	2.30	517.50
03/13/2018	NAM	Email to D. Tischler regarding call with client; analyze what additional materials we need for him; emails and call with D. Solis regarding information needed for his report.	1.00	225.00
03/13/2018	JDN	Prepare for and settlement meeting with defendant's counsel A. Escobar.	1.00	425.00
03/14/2018	SRJ	[REDACTED]; discussions with N. Moore and J. Nelson regarding same; email correspondence with M. Ocampo; email correspondence and call with D. Solis regarding outstanding items; work on translation of documents.	2.60	715.00

03/14/2018	SLK	Continue coordination of translation project regarding responding to emails, organizing incoming documents, payment submittal, responding to questions, preparing additional documents, and checking for quality.	3.00	450.00
03/14/2018	NAM	Analyze additional information needed from experts based on their emails and emails to M. Ocampo and D. Solis regarding same.	1.80	405.00
03/14/2018	NAM	Email to D. Tischler regarding his follow-up questions for client and email to M. Ocampo regarding materials needed for D. Solis.	0.50	112.50
03/14/2018	NAM	Analyze materials needed from D. Solis based on email for same; email to M. Ocampo regarding same; and email to D. Solis regarding notes to financial statements.	0.60	135.00
03/14/2018	JDN	Work on damages [REDACTED]; work on settlement scenarios.	2.00	850.00
03/15/2018	SRJ	[REDACTED]; discussions with N. Moore and J. Nelson regarding same; email correspondence and call with M. Ocampo; email correspondence with D. Solis regarding outstanding items; work on translation of documents.	1.90	522.50
03/15/2018	NAM	Call with M. Ocampo regarding additional information needed for experts and plan for obtaining same.	0.20	45.00
03/15/2018	NAM	Analyze final set of translations and emails to experts regarding same.	0.50	112.50
03/15/2018	NAM	Analyze [REDACTED] email to D. Tischler regarding same.	0.70	157.50
03/15/2018	JDN	[REDACTED]; work on settlement negotiations; work on interrogatories to Flow; work on document requests to Flow.	1.20	510.00
03/16/2018	SRJ	[REDACTED]; discussions with N. Moore regarding same; email correspondence with M. Ocampo; email correspondence with D. Solis regarding outstanding items; work on translation of documents.	1.60	440.00
03/16/2018	NAM	Review answers to D. Solis's questions and email to D. Solis regarding same.	0.70	157.50

03/16/2018	NAM	Analyze emails from D. Tischler regarding additional information needed for report and emails to M. Ocampo and D. Tischler and call with D. Tischler regarding same.	1.40	315.00
03/16/2018	JDN	[REDACTED]; analyze settlement scenarios.	0.60	255.00
03/19/2018	SRJ	[REDACTED]; discussions with N. Moore regarding same.	4.00	1,100.00
03/19/2018	SLK	Extract translations into individual documents; organize translations into subfolder hierarchy; compare each translation against original to verify the work; review translator declarations to determine who translated each folder.	6.60	990.00
03/19/2018	NAM	Revise [REDACTED].	8.70	1,957.50
03/19/2018	JDN	Work on damages [REDACTED].	4.80	2,040.00
03/20/2018	SRJ	[REDACTED] discussions with N. Moore and J. Nelson regarding same.	3.10	852.50
03/20/2018	NAM	Review D. Solis report.	0.70	157.50
03/20/2018	NAM	Prepare for and have call with D. Tischler regarding report and analyze same.	1.60	360.00
03/20/2018	NAM	Revise D. Tischler's report per call with D. Tischler.	4.70	1,057.50
03/20/2018	JDN	Finalize damages expert's report; finalize liability expert's report.	2.40	1,020.00
03/21/2018	SRJ	Discussions with N. Moore and J. Nelson regarding reports of D. Tischler and D. Solis.	0.40	110.00
03/21/2018	SLK	Final comparison of documents and translator declarations and follow-up email to The Word Point regarding discrepancies and questions.	1.60	240.00
03/21/2018	JDN	Analyze final damages expert report; analyze final liability expert report; email to client regarding [REDACTED]; discuss expert issue with C. Tompkins.	2.40	1,020.00
03/21/2018	CWT	Analyze issues with expert discovery following disclosure and evaluate defendant's failure to pursue written expert requests.	0.30	127.50
03/22/2018	SLK	Confirm response from The Word Point and follow-up email.	0.40	60.00
03/26/2018	SRJ	Email correspondence from D. Tischler regarding invoice and focusing tubes.	0.20	55.00
03/26/2018	NAM	Analyze settlement and email to D. Tischler regarding focusing tubes. .	0.30	67.50

Removed

03/26/2018	JDN	Discuss liability expert's questions with N. Moore; discuss settlement strategy with S. Johnson.	0.30	127.50
03/28/2018	SRJ	Discussions with J. Nelson and N. Moore regarding settlement strategy.	1.00	275.00
03/28/2018	NAM	Analyze proposals made by plaintiff's counsel; evaluate appropriate response; email to client regarding same.	0.80	180.00
03/28/2018	JDN	Settlement negotiations with opposing counsel A. Escobar; strategy discussions with S. Johnson and N. Moore; work on recommendation to T. Ruiz and M. Ocampo.	1.20	510.00
03/29/2018	JDN	Revise and finalize email [REDACTED] [REDACTED].	0.50	212.50
03/30/2018	SRJ	Discussion with N. Moore regarding status of settlement discussions and timing of rebuttal expert reports.	0.30	82.50
03/30/2018	NAM	Analyze [REDACTED] [REDACTED] appropriate response to Flow's request for an extension of time for rebuttal expert reports.	0.30	67.50
03/30/2018	JDN	Continue to work on settlement strategy.	0.30	127.50

PROFESSIONAL SERVICES:

\$30,115.00

SERVICES SUMMARY

<u>TIME</u> <u>KEEPER</u>	<u>NAME</u>	<u>RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
SRJ	Shaina R. Johnson	275.00	28.00	7,700.00
SLK	Shane L. Kangas	150.00	14.90	2,235.00
NAM	Natalie A. Moore	225.00	40.20	9,045.00
JDN	James D. Nelson	425.00	25.90	11,007.50
CWT	Christopher W. Tompkins	425.00	0.30	127.50
TOTAL FOR SERVICES			109.30	\$30,115.00

COSTS ADVANCED:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
03/02/2018	Translations.	3,620.00
03/22/2018	Translations.	2,697.11

Color Document Production	42.50
Photocopies Expense	1.95
TOTAL COSTS ADVANCED:	\$6,361.56

STATEMENT TOTAL: **\$36,476.56**

A black and white photograph of a modern building facade. The building features a grid of windows, with some windows having dark frames. A prominent horizontal band, possibly a balcony or a decorative element, runs across the middle of the facade. The building is set against a light background, and the overall composition is clean and architectural.



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May 6, 2018
Client/Matter No. 8404-0001
Statement No. 537326

Tulio Ruiz
Ruiz Fajardo Ingenieros Asociados, S.A.S.
Calle 104 No. 14A-45
Oficina 304 Centro Empresarial 104
Bogota Colombia

RE: Ruiz Fajardo Ingenieros v. Flow Int'l
Claim No.:

INVOICE FOR PROFESSIONAL SERVICES rendered through April 30, 2018:

<u>DATE</u>	<u>TIME</u> <u>KEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/02/2018	SRJ	Discussions with J. Nelson and N. Moore regarding settlement conference potential; consider request from opposing counsel for extension and document production; email correspondence with A. Escobar regarding same; review documents for production for privilege issues.	1.50	412.50
04/02/2018	NAM	Email to M. Ocampo regarding meeting with Flow; analyze [REDACTED] analyze request for extension of time for rebuttal experts and voluntary production of documents in light of same; draft emails to Flow's counsel regarding same.	1.90	427.50
04/02/2018	NAM	Identify and compile expert documents for production to Flow and analyze whether [REDACTED]	1.20	270.00

04/02/2018	JDN	Email from M. Ocampo regarding settlement; confer with S. Johnson and N. Moore; conference call with A. Escobar; emails with A. Escobar regarding deadline.	0.60	255.00
04/03/2018	SRJ	Email correspondence with M. Ocampo and J. Nelson regarding [REDACTED].	0.20	55.00
04/03/2018	JDN	[REDACTED] discussions and emails with A. Escobar, M. Ocampo, S. Johnson, and N. Moore.	0.60	255.00
04/04/2018	SRJ	Discussions with J. Nelson regarding potential settlement conference.	0.40	110.00
04/04/2018	SLK	Compare documents and translator declarations received in response to email regarding discrepancies.	0.70	105.00
04/04/2018	NAM	Email to A. Escobar regarding settlement negotiations.	0.10	22.50
04/05/2018	SRJ	Review documents for production; review discovery requests to Flow; discussions with N. Moore regarding same; discussions with J. Nelson about Flow's request for more time on expert reports; call with A. Escobar regarding same; email correspondence with A. Escobar regarding confidentiality of documents.	2.30	632.50
04/05/2018	NAM	Analyze potential need for protective order for expert documents and revise discovery requests.	1.10	247.50
04/05/2018	NAM	Analyze Flow's continued request to further extend rebuttal expert deadline and email to Flow's counsel regarding agreement to maintain confidentiality of documents sent to experts.	0.70	157.50
04/05/2018	JDN	Settlement negotiations with A. Escobar and related strategy discussions and emails.	1.20	510.00
04/06/2018	SRJ	Discussions with N. Moore regarding confidentiality issues and documents to be produced as well as finalizing document requests to Flow.	0.30	82.50
04/06/2018	NAM	Analyze email from client regarding [REDACTED] and analyze emails from Flow's counsel regarding same.	0.50	112.50
04/06/2018	NAM	Revise and finalize discovery requests for service and email to Flow's counsel with expert documents and regarding protective order for same.	0.40	90.00
04/06/2018	JDN	Finalize interrogatories and requests for production to Flow; produce the documents Ruiz Fajardo's experts' relied upon to Flow.	2.20	935.00

04/16/2018	SRJ	Review deposition notices and discovery requests; email correspondence with M. Ocampo and T. Ruiz regarding same; discussions with J. Nelson regarding same.	0.70	192.50
04/16/2018	JDN	Analyze Flow's five notices of depositions, interrogatories, and requests for production.	1.20	510.00
04/18/2018	SRJ	Discussion with N. Moore regarding discovery responses, depositions, and settlement conference dates.	0.60	165.00
04/18/2018	NAM	Analyze [REDACTED] [REDACTED] [REDACTED] determine depositions that need to be noted and schedule for same; draft protective order needed for discovery responses and topics for 30(b)(6) deposition notice.	1.50	337.50
04/18/2018	JDN	Work on preparation for Fed. R. Civ. P. 30(b)(6) deposition; work on answers to interrogatories; work on responses to document requests.	1.20	510.00
04/19/2018	SRJ	Discussions with J. Nelson and N. Moore regarding responses to discovery requests, 30(b)(6) notice, deposition notices, and timeline moving forward; continue to review discovery requests and work on responses.	1.20	330.00
04/19/2018	NAM	Continue analyzing depositions needed and scheduling of same; email to M. Ocampo regarding [REDACTED].	0.60	135.00
04/19/2018	NAM	Draft 30(b)(6) deposition notice to Flow.	1.60	360.00
04/19/2018	NAM	Review discovery requests from Flow and draft outline of information needed from Ruiz Fajardo with respect to same and draft objections and responses to discovery requests.	2.80	630.00
04/19/2018	JDN	Prepare to defend Flow's Fed. R. Civ. P. 30(b)(6) deposition; prepare to take RF's Fed. R. Civ. P. 30(b)(6) deposition; work on notices of fact witness depositions; work on answers to Flow's interrogatories; work on responses to Flow's document requests; [REDACTED] gy discussions with M. Ocampo, S. Johnson, and N. Moore.	1.80	765.00

04/20/2018	SRJ	Discussions with N. Moore regarding responses to discovery requests, 30(b)(6) notice, deposition notices, and timeline moving forward; continue to review discovery requests and work on responses; call with M. Ocampo regarding same; review draft 30(b)(6) and other deposition notices to Flow.	2.40	660.00
04/20/2018	NAM	Prepare for and participate in call with M. Ocampo regarding [REDACTED].	1.10	247.50
04/20/2018	NAM	Review deposition notices; analyze potential objections to 30(b)(6) notice; email to plaintiff's counsel regarding settlement conference and mediation; emails with D. Solis regarding deposition notice.	1.60	360.00
04/20/2018	NAM	Draft deposition notices for reubttal experts and Flow's country manager.	0.80	180.00
04/21/2018	NAM	Call with D. Tischler regarding deposition.	0.10	22.50
04/23/2018	SRJ	Discussions with J. Nelson and N. Moore regarding upcoming depositions; revise deposition notices; continue to work on discovery responses.	0.80	220.00
04/23/2018	NAM	Revise deposition notices.	0.20	45.00
04/23/2018	NAM	Analyze [REDACTED].	0.50	112.50
04/23/2018	JDN	Work on fact deposition notices; work on expert deposition notices; work on Fed. R. Civ. P. 30(b)(6) notice; work on response to Flow's Fed. R. Civ. P. 30(b)(6) notice; work on answers to interrogatories; work on responses to document requests; strategy discussions with S. Johnson.	1.50	637.50
04/24/2018	SRJ	Email correspondence with D. Solis and D. Tischler regarding upcoming depositions; email correspondence with M. Ocampo regarding [REDACTED].	0.30	82.50
04/24/2018	NAM	Email to defendant's counsel regarding accepting service for experts.	0.10	22.50
04/24/2018	NAM	Analyze [REDACTED].	0.40	90.00
04/24/2018	NAM	Email to D. Solis regarding billing for deposition; email to defendant's counsel regarding D. Tischler's deposition; email to D. Tischler regarding deposition.	0.30	67.50

04/24/2018	NAM	Call with A. Escobar regarding video settlement conference and email to client regarding same.	0.30	67.50
04/24/2018	JDN	Work on response to Flow's Fed. R. Civ. P. 30(b)(6) notice; work on answers to interrogatories; work on responses to document requests; work on settlement teleconference; prepare for experts' depositions.	1.50	637.50
04/25/2018	SRJ	Email correspondence with M. Ocampo regarding [REDACTED].	0.40	110.00
04/25/2018	NAM	Analyze logistics for settlement conference and email to client regarding same.	0.20	45.00
04/25/2018	JDN	Work on settlement teleconference; work on answers to interrogatories; work on responses to Flow's 30(b)(6) topics; work on responses to document requests.	0.60	255.00
04/26/2018	SRJ	Email correspondence with M. Ocampo and A. Escobar regarding settlement conference.	0.40	110.00
04/26/2018	NAM	Analyze mediation scheduling and settlement conference and email to plaintiff's counsel regarding same.	0.30	67.50
04/26/2018	JDN	Work on settlement strategy; work on settlement teleconference; work on scheduling mediation; work on discovery responses.	0.90	382.50
04/27/2018	SRJ	Email correspondence with M. Ocampo and A. Escobar regarding settlement conference; discussions with J. Nelson and N. Moore regarding upcoming depositions.	0.50	137.50
04/27/2018	NAM	Emails and calls with A. Escobar regarding settlement conference.	0.30	67.50
04/27/2018	JDN	Work on responses to Flow's interrogatories and document requests; prepare to take Flow's Fed. R. Civ. P. 30(b)(6) and fact depositions; work with M. Ocampo to prepare for May 1 settlement teleconference.	1.20	510.00
04/30/2018	SRJ	Email correspondence with M. Ocampo and A. Escobar regarding settlement conference; discussions with J. Nelson and N. Moore regarding upcoming depositions.	0.40	110.00
04/30/2018	NAM	Calls and emails with A. Escobar regarding settlement conference.	0.30	67.50
04/30/2018	NAM	Review and analyze rebuttal expert reports and emails to client and experts regarding same.	1.00	225.00

\$14,665.00





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Tax ID: 91-1155124

June 7, 2018
Client/Matter No. 8404-0001
Statement No. 537794

Tulio Ruiz
Ruiz Fajardo Ingenieros Asociados, S.A.S.
Calle 104 No. 14A-45
Oficina 304 Centro Empresarial 104
Bogota Colombia

RE: Ruiz Fajardo Ingenieros v. Flow Int'l
Claim No.:

INVOICE FOR PROFESSIONAL SERVICES rendered through May 31, 2018:

<u>DATE</u>	<u>TIME</u> <u>KEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/01/2018	SRJ	Email correspondence with J. Nelson regarding settlement conference; discussions with N. Moore regarding upcoming depositions and protective order.	0.70	192.50
05/01/2018	NAM	Prepare for settlement conference and analyze expert rebuttal reports in preparation for depositions.	0.50	112.50
05/01/2018	JDN	Prepare for settlement meeting; attend settlement meeting; post-meeting call from A. Escobar; confer with S. Johnson; report to T. Ruiz and M. Ocampo; work on answers to interrogatories; work on responses to document requests.	5.50	2,337.50
05/02/2018	SRJ	Discussions with J. Nelson and N. Moore regarding settlement conference, upcoming depositions, defendants' request for continuance, and protective order; review draft emails responding to A. Escobar on continuance issue; email correspondence with M. Ocampo regarding continuance and discovery responses.	1.50	412.50

05/02/2018	NAM	Analyze response to defendant's request for an extension of trial date and related deadlines and draft email to defendant's counsel regarding same, draft amended deposition notices to defendant's experts, and analyze [REDACTED].	2.10	472.50
05/02/2018	JDN	Work on answers to interrogatories; work on responses to document requests; work on request for a continuance; prepare for upcoming Flow depositions.	1.50	637.50
05/03/2018	SRJ	Discussions with J. Nelson and N. Moore regarding settlement conference and upcoming depositions; review draft protective order; begin to review Flow's motion for a continuance and protective order.	2.10	577.50
05/03/2018	NAM	Identify and compile documents for deposition preparation.	1.20	270.00
05/03/2018	NAM	Draft protective order and email to clients regarding same; send amended deposition notices for Flow's experts.	3.10	697.50
05/03/2018	JDN	Prepare to take upcoming Flow depositions; work on amended deposition notices.	1.20	510.00
05/04/2018	SRJ	Discussions with J. Nelson regarding upcoming depositions and Flow's motion for a continuance and protective order; continue to review Flow's motion for a continuance and consider arguments in response; email correspondence with A. Escobar and M. Ocampo regarding same.	2.40	660.00
05/04/2018	JDN	Prepare to take three Flow depositions; analyze Flow's motion for a continuance; begin drafting appropriate response; strategy discussions with S. Johnson.	1.80	765.00
05/07/2018	SRJ	Discussions with N. Moore and J. Nelson regarding Flow's motion for a continuance and our opposition and discovery responses; email correspondence with M. Ocampo regarding discovery and interrogatory answers; work on preparing documents for production; review Flow's discovery responses.	2.10	577.50
05/07/2018	NAM	Email to D. Tischler regarding deposition; analyze [REDACTED]; review documents sent by client. .	0.90	202.50
05/07/2018	NAM	Draft opposition to motion for extension of time.	4.40	990.00

05/07/2018	JDN	Draft RF's opposition to Flow's motion for a continuance; work on RF's answers to interrogatories and document requests; strategy discussions with M. Ocampo, S. Johnson, and N. Moore.	0.60	255.00
05/08/2018	SRJ	Discussions with N. Moore and J. Nelson regarding Flow's motion for a continuance and our opposition and discovery responses; email correspondence with M. Ocampo regarding discovery and interrogatory answers; work on preparing documents for production.	1.10	302.50
05/08/2018	NAM	Draft opposition to motion for a continuance and revise protective order.	8.40	1,890.00
05/08/2018	JDN	Work on interrogatory answers; work on producing documents; work on protective order; work on continuance opposition; study expert reports; analyze Flow's discovery responses.	1.80	765.00
05/09/2018	SRJ	Discussions with N. Moore and J. Nelson regarding Flow's motion for a continuance and our opposition and discovery responses; revise opposition in preparation for filing; email correspondence with M. Ocampo regarding discovery and interrogatory answers; continue to work on preparing documents for production.	5.80	1,595.00
05/09/2018	NAM	Continue drafting opposition to motion for a protective order and draft proposed order.	5.80	1,305.00
05/09/2018	JDN	Work on RF's opposition to Flow's motion for a continuance; work on answers to Flow's interrogatories; work on responses to Flow's document requests.	2.40	1,020.00
05/10/2018	SRJ	Discussions with N. Moore and J. Nelson regarding discovery responses and interrogatory answers; revise draft responses; email correspondence and call with M. Ocampo regarding discovery and interrogatory answers; continue to work on preparing documents for production.	4.70	1,292.50
05/10/2018	SLK	Prepare production to include translations, Solis folder, client emails, and documents from OneDrive.	3.60	540.00
05/10/2018	NAM	Draft discovery responses and email to client regarding same.	3.40	765.00
05/10/2018	JDN	Work on answers to Flow's interrogatories; work on responses to Flow's document requests.	1.20	510.00

05/11/2018	SRJ	Discussions with N. Moore and J. Nelson regarding discovery responses and interrogatory answers; revise draft responses; email correspondence and call with M. Ocampo regarding discovery and interrogatory answers; continue to work on preparing documents for production.	1.10	302.50
05/11/2018	NAM	Revise discovery responses and finalize for production.	0.90	202.50
05/11/2018	JDN	Finalize answers to interrogatories; finalize responses to document requests; finalize document production.	4.20	1,785.00
05/14/2018	SRJ	Review Flow's reply brief in support of motion for extension of time; begin to review Flow's document production; email correspondence with M. Ocampo regarding same; discussion with J. Nelson regarding timeline and deposition schedule.	1.10	302.50
05/14/2018	JDN	Analyze Flow's reply brief in support of its motion for a continuance and the supporting declaration; begin to analyze Flow's recent document production.	0.70	297.50
05/16/2018	SRJ	Discuss case status and upcoming deadlines with J. Nelson.	0.30	82.50
05/17/2018	SRJ	Discussion with J. Nelson and M. Tyson regarding case status, deadlines, and review of Flow documents.	0.70	192.50
05/17/2018	JDN	Analyze Flow's document production.	1.20	510.00
05/17/2018	MWT	Attorney meeting regarding discovery and trial preparation.	0.60	165.00
05/17/2018	MWT	Review demand letter and exhibits sent to defense counsel.	0.50	137.50
05/23/2018	SRJ	Email correspondence with M. Ocampo regarding decision on motion for a continuance and verification of discovery responses.	0.30	82.50
05/24/2018	SRJ	Email correspondence from M. Ocampo regarding verification signature.	0.20	55.00
05/24/2018	JDN	Emails with experts D. Tischler and D. Solis.	0.10	42.50
PROFESSIONAL SERVICES:				<u>\$23,812.50</u>

SERVICES SUMMARY

TIME KEEPER	NAME	RATE	HOURS	AMOUNT
SRJ	Shaina R. Johnson	275.00	24.10	6,627.50
SLK	Shane L. Kangas	150.00	3.60	540.00
NAM	Natalie A. Moore	225.00	30.70	6,907.50
JDN	James D. Nelson	425.00	22.20	9,435.00
MWT	Mark W. Tyson	275.00	1.10	302.50
	TOTAL FOR SERVICES		81.70	\$23,812.50

COSTS ADVANCED:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
05/08/2018	Solis Financial Forensics 8404-0001 Expert Professonal fees.	675.00
05/15/2018	SoundPath Conferencing 8404-0001 Readyconference plus Audio with client, 3/15/18.	2.75
05/15/2018	SoundPath Conferencing 8404-0001 Readyconference plus Audio with client, 3/13/18.	41.58
	Color Document Production	341.00
	Photocopies Expense	120.15
TOTAL COSTS ADVANCED:		\$1,180.48

STATEMENT TOTAL: **\$24,992.98**

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graph TD
    President[President] --> Sales[Sales]
    President --> Production[Production]
    President --> Finance[Finance]
    Sales --> SalesDept[Sales Department]
    Sales --> SalesOffice1[Sales Office]
    Sales --> SalesOffice2[Sales Office]
    Sales --> SalesOffice3[Sales Office]
    Sales --> SalesOffice4[Sales Office]
    Production --> ProductionDept[Production Department]
    Production --> ProductionOffice1[Production Office]
    Production --> ProductionOffice2[Production Office]
    Production --> ProductionOffice3[Production Office]
    Production --> ProductionOffice4[Production Office]
    Finance --> FinanceDept[Finance Department]
    Finance --> FinanceOffice1[Finance Office]
    Finance --> FinanceOffice2[Finance Office]
    Finance --> FinanceOffice3[Finance Office]
    Finance --> FinanceOffice4[Finance Office]
  
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July 5, 2018
Client/Matter No. 8404-0001
Statement No. 538041

Tulio Ruiz
Ruiz Fajardo Ingenieros Asociados, S.A.S.
Calle 104 No. 14A-45
Oficina 304 Centro Empresarial 104
Bogota Colombia

RE: Ruiz Fajardo Ingenieros v. Flow Int'l
Claim No.:

INVOICE FOR PROFESSIONAL SERVICES rendered through June 30, 2018:

<u>DATE</u>	<u>TIME</u> <u>KEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/01/2018	SRJ	Email correspondence with S. Kangas regarding Flow's production of documents.	0.30	82.50
06/01/2018	SLK	Organize and prepare index of documents received from client.	2.60	390.00
06/04/2018	SLK	Begin transfer and organize defendant's document production.	0.60	90.00
06/06/2018	SLK	Continue to organize defendant's document production.	0.40	60.00
06/07/2018	JDN	Analyze Flow's document production.	1.20	510.00
06/08/2018	SRJ	Continue to organize review of Flow documents and next steps given upcoming deadlines.	0.40	110.00
06/11/2018	SRJ	Email correspondence with A. Escobar and J. DeGroot regarding T. Ruiz verification page; continue to work on review of Flow's documents.	0.50	137.50
06/11/2018	JDN	Work on Flow document review.	0.30	127.50
06/11/2018	MWT	Continue to review and analyze letter to defense counsel regarding settlement proposal for purpose of preparing for June 12 attorney strategy meeting.	0.40	110.00

06/11/2018	MWT	Begin to review and analyze expert reports and exhibits thereto for purpose of preparing for June 12 attorney strategy meeting.	0.70	192.50
06/12/2018	SRJ	Continue to work on review of Flow's documents; discussions with M. Tyson regarding document review project.	0.80	220.00
06/12/2018	MWT	Continue to review and analyze letter to defense counsel regarding settlement proposal for purpose of preparing for June 12 attorney strategy meeting.	0.20	55.00
06/12/2018	MWT	Continue to review and analyze expert reports and exhibits thereto for purpose of preparing for June 12 attorney strategy meeting.	0.20	55.00
06/12/2018	MWT	Attend attorney case strategy meeting.	0.30	82.50
06/12/2018	MWT	Begin to review and analyze defendant's responses and objections to plaintiff's first set of discovery requests.	0.30	82.50
06/12/2018	MWT	Begin to review and analyze documents produced by defendant in response to plaintiff's written discovery requests.	0.40	110.00
06/13/2018	MWT	Continue to review and analyze defendant's responses and objections to plaintiff's first set of discovery requests.	0.30	82.50
06/13/2018	MWT	Continue to review and analyze documents produced by defendant in response to plaintiff's written discovery requests.	1.00	275.00
06/15/2018	SRJ	Consider [REDACTED]; discussions with J. Nelson regarding same.	0.50	137.50
06/15/2018	JDN	Analyze Flow's recent document production; discuss [REDACTED] with S. Johnson.	0.90	382.50
06/18/2018	SRJ	Consider [REDACTED].	0.40	110.00
06/18/2018	JDN	Work on review of Flow's document production.	0.30	127.50
06/22/2018	JDN	Emails with co-counsel M. Ocampo and liability expert D. Tischler.	0.30	127.50
06/26/2018	SRJ	Discussion with J. Nelson regarding case status and schedules, as well as issues with current trial date.	0.50	137.50
06/27/2018	SRJ	Discussion with J. Nelson regarding case status and schedules; discussions with M. Tyson regarding review of Flow documents and discovery issues; consider need for discovery conference with Flow to discuss deficient discovery responses.	0.80	220.00

06/28/2018	MWT	Continue to review and analyze plaintiff's discovery responses.	0.20	55.00
06/28/2018	MWT	Prepare memorandum summarizing plaintiff's written discovery responses and document production.	0.40	110.00
06/29/2018	MWT	Continue preparing memorandum summarizing plaintiff's written discovery responses and document production.	0.60	165.00
06/29/2018	MWT	Continue reviewing 1000+ documents produced by Flow for purpose of preparing summary of documents.	0.80	220.00

PROFESSIONAL SERVICES:

\$4,565.00

SERVICES SUMMARY

TIME KEEPER	NAME	RATE	HOURS	AMOUNT
SRJ	Shaina R. Johnson	275.00	4.20	1,155.00
SLK	Shane L. Kangas	150.00	3.60	540.00
JDN	James D. Nelson	425.00	3.00	1,275.00
MWT	Mark W. Tyson	275.00	5.80	1,595.00
	TOTAL FOR SERVICES		16.60	\$4,565.00

COSTS ADVANCED:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
06/19/2018	SoundPath Conferencing 8404-0001 Telephone conference call-N. Moore.	5.29
TOTAL COSTS ADVANCED:		<hr/> \$5.29

STATEMENT TOTAL:

\$4,570.29

Age Group	Male (%)	Female (%)
18-24	10	10
25-34	10	10
35-44	10	10
45-54	10	10
55-64	10	10

[REDACTED]
[REDACTED]
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[REDACTED]
[REDACTED]

[REDACTED]



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Tax ID: 91-1155124

August 6, 2018
Client/Matter No. 8404-0001
Statement No. 538363

Tulio Ruiz
Ruiz Fajardo Ingenieros Asociados, S.A.S.
Calle 104 No. 14A-45
Oficina 304 Centro Empresarial 104
Bogota Colombia

RE: Ruiz Fajardo Ingenieros v. Flow Int'l
Claim No.:

INVOICE FOR PROFESSIONAL SERVICES rendered through July 31, 2018:

<u>DATE</u>	<u>TIME</u> <u>KEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/10/2018	SRJ	Review [REDACTED]	0.60	165.00
07/11/2018	SRJ	Review requirements for upcoming pretrial statement; discussions with J. Nelson regarding same and outstanding discovery issues; discussions with J. Taylor regarding letter to opposing counsel regarding outstanding discovery responses from Flow.	1.80	495.00
07/11/2018	JDN	Work on Rule 37/letter to opposing counsel requesting a discovery conference to cure defects in Flow's discovery responses.	0.60	255.00
07/11/2018	JLT	Discuss case with S. Johnson.	0.30	67.50
07/11/2018	JLT	Review documents in file to draft letter to opposing counsel.	1.20	270.00
07/12/2018	SRJ	Review and revise letter to opposing counsel regarding outstanding discovery issues.	0.60	165.00
07/12/2018	JDN	Work on Rule 37/letter to opposing counsel requesting a discovery conference to cure defects in Flow's discovery responses.	0.90	382.50

07/12/2018	JLT	Analyze documents and draft letter to opposing counsel.	1.30	292.50
07/13/2018	SRJ	Discussion with J. Taylor regarding revisions to discovery letter to opposing counsel and request for discovery conference.	0.40	110.00
07/13/2018	JDN	Work on Rule 37 letter to opposing counsel requesting a discovery conference to cure defects in Flow's discovery responses.	0.60	255.00
07/13/2018	JLT	Incorporate changes and draft letter to opposing counsel.	3.20	720.00
07/16/2018	SRJ	Review and revise discovery letter to opposing counsel.	1.60	440.00
07/16/2018	JDN	Work on Rule 37 letter to opposing counsel requesting a discovery conference to cure defects in Flow's discovery responses.	1.10	467.50
07/16/2018	JLT	Analyze documents and draft letter.	1.10	247.50
07/17/2018	SRJ	Review and revise letter to opposing counsel regarding outstanding discovery; discussions with J. Taylor and J. Nelson regarding same; email correspondence with M. Ocampo regarding same.	1.10	302.50
07/17/2018	JDN	Revise and finalize detailed Fed. R. Civ. P. 26/ and 37/ letter to Flow demanding a discovery conference to discuss Flow's woefully incomplete and tardy discovery responses.	1.20	510.00
07/17/2018	JLT	Revise letter to opposing counsel.	0.20	45.00
07/18/2018	SRJ	Email correspondence from A. Escobar regarding outstanding discovery and deadlines; consider appropriate response.	0.30	82.50
07/18/2018	JLT	Review documents and analyze legal arguments.	1.20	330.00
07/19/2018	SRJ	Discussions with J. Nelson and M. Tyson regarding response to Flow regarding discovery and upcoming deadlines; email correspondence with A. Escobar regarding outstanding discovery and proposed call to the court regarding pending motion to continue deadlines.	1.40	385.00
07/19/2018	JDN	Draft second letter to opposing counsel A. Escobar regarding RF's need for a discovery conference and Flow's proposed call to the court including strategy discussions with S. Johnson and M. Tyson as well as analysis of Judge Jones's practices and procedures web page in the context of motions to extend deadlines and LCR 7(b)(5) on undecided motions.	1.20	510.00

07/19/2018	JDN	Begin drafting mandatory LCR 16(h) plaintiff's pretrial statement.	0.30	127.50
07/19/2018	JLT	Review correspondence and discuss next steps with S. Johnson.	0.20	45.00
07/19/2018	MWT	Review letter to defense counsel regarding discovery dispute for purpose of preparing for call with defense counsel regarding the same.	0.20	45.00
07/19/2018	MWT	Attorney meeting regarding discovery strategy.	0.70	157.50
07/19/2018	MWT	Research Western District of Washington local rules regarding issue of timing on decisions on motions to extend deadlines.	0.20	45.00
07/19/2018	MWT	Prepare plaintiff's pretrial statement.	0.40	90.00
07/20/2018	SRJ	Email correspondence with J. DeGroot regarding Flow's discovery responses and call to court.	0.30	82.50
07/20/2018	MWT	Continue preparing plaintiff's pretrial statement.	0.70	157.50
07/20/2018	MWT	Review complaint and answer for purpose of preparing plaintiff's pretrial statement.	0.50	112.50
07/20/2018	MWT	Review plaintiff's expert reports and exhibits for purpose of preparing plaintiff's pretrial statement.	0.40	90.00
07/23/2018	SRJ	Email correspondence with M. Ocampo regarding discovery letter; discussion with M. Tyson regarding call from court deputy; email correspondence with opposing counsel regarding timing on decision on motion to continue.	0.50	137.50
07/23/2018	MWT	Email with defense counsel regarding call to court on defendant's motion to continue trial.	0.20	45.00
07/23/2018	MWT	Continue reviewing expert reports and exhibits for purpose of preparing plaintiff's pretrial statement.	1.50	337.50
07/23/2018	MWT	Continue preparing plaintiff's pretrial statement.	0.50	112.50
07/23/2018	MWT	Review defendant's motion to continue trial for purpose of preparing for call regarding motion with court.	0.30	67.50
07/23/2018	MWT	Call to court with defense counsel regarding defendant's motion to continue trial.	0.20	45.00
07/24/2018	SRJ	Discussion with M. Tyson regarding pretrial statement.	0.30	82.50
07/24/2018	MWT	Continue preparing plaintiff's pretrial statement.	1.20	270.00
07/24/2018	MWT	Continue reviewing expert reports and exhibits for purpose of preparing plaintiff's pretrial statement.	0.90	202.50
07/24/2018	MWT	Continue reviewing plaintiff's complaint for purpose of preparing plaintiff's pretrial statement.	0.20	45.00

07/25/2018	SRJ	Discussion with J. Nelson regarding pre-trial statement and upcoming deadlines.	0.40	110.00
07/25/2018	JDN	Work on mandatory LCR 16 plaintiff's pretrial statement including strategy discussions with S. Johnson.	0.30	127.50
07/25/2018	MWT	Continue preparing plaintiff's pretrial statement.	0.30	67.50
07/26/2018	SRJ	Email correspondence from courtroom deputy regarding request for status memorandum regarding pending motion for continuance; begin to consider responses regarding status of discovery and pretrial schedule.	0.60	165.00
07/26/2018	JDN	Analyze email from Judge Jones's in-court deputy V. Erickson requiring responses to trial date-related questions by August 2.	0.30	127.50
07/26/2018	MWT	Continue preparing plaintiff's pretrial statement.	0.40	90.00
07/27/2018	SRJ	Begin drafting status report regarding status of discovery and pending motion for continuance; review draft pre-trial statement; discussions with J. Nelson, J. Taylor, and M. Tyson regarding same.	3.60	990.00
07/27/2018	JDN	Work on status report to Judge Jones; work on deposition preparation; work on trial PowerPoint slides; work on trial witness strategy.	1.10	467.50
07/27/2018	JLT	Analyze discovery responses; meeting to discuss next steps; review case status report.	5.10	1,147.50
07/27/2018	MWT	Continue preparing plaintiff's pretrial statement.	2.10	472.50
07/27/2018	MWT	Continue reviewing expert reports and exhibits for purpose of preparing plaintiff's pretrial statement.	1.10	247.50
07/27/2018	MWT	Attorney strategy meeting regarding defendant's motion to continue trial and plaintiff's pretrial statement.	0.50	112.50
07/30/2018	SRJ	Continue drafting status report regarding status of discovery and pending motion for continuance; continue revising draft pretrial statement; discussions with J. Nelson, J. Taylor, and M. Tyson regarding same; email correspondence with M. Ocampo, D. Solis, and D. Tischler regarding changes to discovery and trial schedule; email correspondence with J. DeGroot regarding status report to court.	3.30	907.50
07/30/2018	JDN	Draft and revise status report ordered by Judge Jones; review email to M. Ocampo and from J. DeGroot regarding same.	0.60	255.00
07/30/2018	JLT	Correspondence.	0.20	45.00

07/31/2018	SRJ	Continue revising draft pretrial statement; email correspondence with M. Ocampo regarding changes to discovery and trial schedule; email correspondence with J. DeGroot regarding status report to court.	1.30	357.50
07/31/2018	JDN	Work on status report requested by Judge Jones including emails with M. Ocampo, D. Tischler, D. Solis, and J. DeGroot.	0.60	255.00
07/31/2018	MWT	Revise plaintiff's pretrial statement.	0.70	157.50

PROFESSIONAL SERVICES:

\$14,897.50

SERVICES SUMMARY

TIME KEEPER	NAME	RATE	HOURS	AMOUNT
SRJ	Shaina R. Johnson	275.00	18.10	4,977.50
JDN	James D. Nelson	425.00	8.80	3,740.00
JLT	Jesse L. Taylor	225.00	12.80	2,880.00
JLT	Jesse L. Taylor	275.00	1.20	330.00
MWT	Mark W. Tyson	225.00	13.20	2,970.00
	TOTAL FOR SERVICES		54.10	\$14,897.50

Reduced to lower rate of \$225/hour	
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COSTS ADVANCED:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
	Color Document Production	10.50
	Photocopies Expense	5.70
TOTAL COSTS ADVANCED:		<u>\$16.20</u>

STATEMENT TOTAL:

\$14,913.70

Age Group	Male (%)	Female (%)
18-24	~45	~55
25-34	~35	~65
35-44	~55	~45
45-54	~65	~35
55-64	~75	~25

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]



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Tax ID: 91-1155124

September 10, 2018
Client/Matter No. 8404-0001
Statement No. 538744

Tulio Ruiz
Ruiz Fajardo Ingenieros Asociados, S.A.S.
Calle 104 No. 14A-45
Oficina 304 Centro Empresarial 104
Bogota Colombia

RE: Ruiz Fajardo Ingenieros v. Flow Int'l
Claim No.:

INVOICE FOR PROFESSIONAL SERVICES rendered through August 31, 2018:

<u>DATE</u>	<u>TIME</u> <u>KEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/01/2018	SRJ	Continue revising draft pretrial statement; revise status report; call with J. DeGroot regarding status report to court; discussions with J. Nelson and M. Tyson regarding same.	1.70	467.50
08/01/2018	JLT	Correspondence and discussion with S. Johnson.	0.20	55.00
08/01/2018	MWT	Continue revising plaintiff's pretrial statement.	1.20	330.00
08/01/2018	MWT	Continue to review and analyze expert reports and exhibits for purpose of revising plaintiff's pretrial statement.	0.80	220.00
08/02/2018	SRJ	Continue revising draft pretrial statement; revise status report; discussions with J. Nelson and M. Tyson regarding same; review Flow's status report.	1.00	275.00
08/02/2018	JDN	Draft and revise plaintiff's pretrial statement; revise and finalize RF's status report to Judge Jones.	0.60	255.00
08/02/2018	JLT	Review status report and document production.	1.70	467.50
08/02/2018	MWT	Continue to review client financial documents for purpose of revising plaintiff's pretrial statement.	0.60	165.00
08/02/2018	MWT	Continue revising plaintiff's pretrial statement.	1.00	275.00

08/02/2018	MWT	Continue to review complaint for purpose of revising plaintiff's pretrial statement.	0.20	55.00
08/03/2018	SRJ	Continue revising draft pretrial statement; revise status report; call with J. DeGroot regarding Flow's document production and stipulated protective order.	1.40	385.00
08/03/2018	JDN	Revise and finalize plaintiff's pretrial statement; analyze Flow's status report to Judge Jones; begin to analyze Flow's document production.	1.80	765.00
08/03/2018	JLT	Review defendant's status report and responses to interrogatories.	0.40	110.00
08/03/2018	MWT	Continue revising plaintiff's pretrial statement.	0.50	137.50
08/03/2018	MWT	Continue to review client financial documents for purpose of revising plaintiff's pretrial statement.	0.30	82.50
08/06/2018	SRJ	Discussions with J. Taylor regarding Flow's document production and discovery dispute.	0.70	192.50
08/06/2018	JDN	Analyze Flow's document production.	0.30	127.50
08/06/2018	JLT	Review document production.	3.10	852.50
08/08/2018	JLT	Document review.	0.20	45.00
08/09/2018	JDN	Review Judge Jones's orders; review Flow's production.	0.60	255.00
08/09/2018	JLT	Document review.	3.80	855.00
08/09/2018	JLT	Review defendant's amended responses and objections to plaintiff's first set of interrogatories and requests for production of documents.	1.70	382.50
08/10/2018	JLT	Document review.	4.80	1,080.00
08/10/2018	JLT	Call with opposing counsel; discuss depositions.	0.60	135.00
08/13/2018	JDN	Analyze email from M. Ocampo discussing strategy options going forward.	0.60	255.00
08/13/2018	JLT	Document review.	2.90	652.50
08/13/2018	JLT	Correspondence with M. Ocampo; review Fed. R. Civ. P. 30(b)(6) topics.	0.70	157.50
08/13/2018	JLT	Draft notice of appearance.	0.30	67.50
08/15/2018	JLT	Document review.	1.00	225.00
08/17/2018	SLK	Meeting with J. Taylor to discuss management of plaintiff's production.	0.20	30.00
08/17/2018	JLT	Document review and organization.	0.70	157.50
08/20/2018	JDN	Preparation for and conference call with A. Escobar, J. DeGroot, and A. Walker to discuss deposition logistics, locations and schedules.	1.20	510.00

08/20/2018	JLT	Document review; review correspondence for call with opposing counsel.	0.90	202.50
08/20/2018	JLT	Meeting with J. Nelson to discuss next steps.	0.50	112.50
08/20/2018	JLT	Correspondence with opposing counsel; review deposition notices.	0.30	67.50
08/20/2018	JLT	Call with opposing counsel regarding depositions.	0.70	157.50
08/20/2018	JLT	Review [REDACTED].	1.40	315.00
08/21/2018	SLK	Begin review and classification marking of Flow's production.	4.40	660.00
08/21/2018	JDN	Prepare for approximately ten upcoming fact and expert depositions.	1.20	510.00
08/21/2018	JLT	Organize document production.	0.30	67.50
08/22/2018	JLT	Review documents and interrogatories.	2.60	585.00
08/23/2018	JDN	Discuss status and strategy with J. Taylor.	0.30	127.50
08/23/2018	JLT	Document and interrogatory review.	7.70	1,732.50
08/24/2018	JLT	Analyze complaint and expert reports; prepare [REDACTED].	6.70	1,507.50
08/27/2018	JDN	Work on determining which documents to translate; work on [REDACTED]; work on preparing for upcoming lay and expert depositions; analyze [REDACTED]; confer with J. Taylor regarding depositions and summary judgment; conference call with Flow's counsel on depositions; email to T. Ruiz and M. Ocampo [REDACTED].	1.20	510.00
08/27/2018	JLT	Meeting with J. Nelson; correspondence with M. Ocampo; [REDACTED]; conference call with opposing counsel.	8.60	1,935.00
08/28/2018	JDN	Work on deposition preparation notebook; emails with M. Ocampo on deposition schedule; work on review of newly-produced Flow documents.	1.20	510.00
08/28/2018	JLT	Meeting with J. Nelson and emails with M. Ocampo.	0.30	67.50
08/28/2018	JLT	Review Flow documents; emails with M. Ocampo; [REDACTED].	2.40	540.00
08/29/2018	JDN	Prepare for seven Ruiz Fajardo depositions and five Flow depositions including strategy discussions and emails with M. Ocampo and J. Taylor.	2.40	1,020.00
08/29/2018	JLT	Correspondence with M. Ocampo.	0.20	45.00
08/29/2018	JLT	Organize exhibits [REDACTED].	3.50	787.50

08/30/2018	JDN	Prepare for seven Ruiz Fajardo depositions and five Flow depositions; draft Ruiz Fajardo's motion for partial summary judgment on liability.	2.10	892.50	Removed half
08/30/2018	JLT	Revise narrative for depositions; meeting with S. Kangas to discuss exhibits; document review; meeting with J. Nelson; [REDACTED].	4.70	1,057.50	
08/30/2018	JLT	Meeting with J. Nelson; revisions to deposition statement of facts; compile exhibits; correspondence with M. Ocampo.	2.80	630.00	
08/31/2018	SLK	Review production to identify documents referenced in factual statement in both English and Spanish.	2.20	330.00	
08/31/2018	SLK	Prepare documents referenced in factual statement for submittal.	1.40	210.00	
08/31/2018	JDN	Prepare for seven Ruiz Fajardo depositions and five Flow depositions; draft Ruiz Fajardo's motion for partial summary judgment on liability.	1.80	765.00	Removed half
08/31/2018	JLT	Review statement of facts; research [REDACTED]	6.10	1,372.50	

PROFESSIONAL SERVICES:

\$26,742.50

SERVICES SUMMARY

<u>TIME</u> <u>KEEPER</u>	<u>NAME</u>	<u>RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>	
SRJ	Shaina R. Johnson	275.00	4.80	1,320.00	
SLK	Shane L. Kangas	150.00	8.20	1,230.00	
JDN	James D. Nelson	425.00	15.30	6,502.50	
JLT	Jesse L. Taylor	225.00	66.40	14,940.00	
JLT	Jesse L. Taylor	275.00	5.40	1,485.00	Discounted to lower rate of \$225/hour
MWT	Mark W. Tyson	275.00	4.60	1,265.00	
TOTAL FOR SERVICES			104.70	\$26,742.50	

COSTS ADVANCED:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
	Photocopies Expense	29.25
TOTAL COSTS ADVANCED:		\$29.25

STATEMENT TOTAL:

\$26,771.75

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graph TD
    Scene[Scene] --> Environment[Environment]
    Scene --> Character[Character]
    Scene --> Camera[Camera]
    Environment --> Background[Background]
    Environment --> Ground[Ground]
    Environment --> Sky[Sky]
    Character --> Head[Head]
    Character --> Torso[Torso]
    Character --> Legs[Legs]
    Camera --> Lens[Lens]
    Camera --> Sensor[Sensor]
    Camera --> Controller[Controller]
  
```

114



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October 22, 2018
Client/Matter No. 8404-0001
Statement No. 539240

Tulio Ruiz
Ruiz Fajardo Ingenieros Asociados, S.A.S.
Calle 104 No. 14A-45
Oficina 304 Centro Empresarial 104
Bogota Colombia

RE: Ruiz Fajardo Ingenieros v. Flow Int'l
Claim No.:

INVOICE FOR PROFESSIONAL SERVICES rendered through September 30, 2018:

<u>DATE</u>	<u>TIME</u> <u>KEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>	
09/04/2018	JDN	Prepare for seven Ruiz Fajardo depositions and five Flow depositions; consider Ruiz Fajardo's motion for partial summary judgment on liability; conference call with M. Ocampo and J. Taylor.	1.80	765.00	Removed half
09/04/2018	JLT	Draft motion for summary judgment; analyze settlement and demand letters.	3.10	697.50	Removed half
09/04/2018	JLT	Meeting with J. Nelson to discuss next steps; emails with opposing counsel regarding translator.	0.20	45.00	
09/04/2018	JLT	Review correspondence with M. Ocampo.	0.20	45.00	
09/04/2018	JLT	Emails with M. Ocampo and M. Malinowski to set up Skype calls.	0.50	0.00	No Charge
09/04/2018	JLT	Research [REDACTED]	0.60	135.00	
09/04/2018	JLT	Skype call with M. Ocampo.	0.50	112.50	
09/05/2018	JDN	Emails with M. Ocampo regarding [REDACTED]; emails with J. DeGroot regarding deposition scheduling; emails with J. Taylor regarding interpreters; deposition preparation by Skype meeting.	2.40	1,020.00	

09/05/2018	JLT	Document review; correspondence with opposing counsel.	2.00	450.00	
09/05/2018	JLT	Skype call with M. Ocampo and Ruiz Fajardo employees.	1.10	247.50	
09/05/2018	JLT	Correspondence with M. Ocampo to schedule depositions; review correspondence; analyze documents for depositions.	1.40	315.00	
09/06/2018	JLT	Correspondence with M. Ocampo and opposing counsel; draft deposition schedule.	0.60	135.00	
09/06/2018	JLT	Deposition preparation; analyze deposition documents.	0.70	157.50	
09/06/2018	JLT	Research and draft summary judgment motion.	2.80	630.00	Removed
09/06/2018	JLT	Correspondence with M. Ocampo and opposing counsel concerning deposition scheduling.	0.30	67.50	
09/07/2018	JDN	Prepare for seven Ruiz Fajardo depositions and five Flow depositions; consider [REDACTED]; strategy discussions with J. Taylor; strategy emails with M. Ocampo; call to liability expert D. Tischler; call to damages expert D. Solis.	2.10	892.50	
09/07/2018	JLT	Correspondence with M. Ocampo; draft deposition schedule; discuss schedule with J. Nelson; review translator resumes.	1.00	225.00	
09/07/2018	JLT	Deposition preparation.	0.80	180.00	
09/07/2018	JLT	Meeting with N. Khachatourians to discuss deposition strategy.	0.30	67.50	
09/07/2018	JLT	Correspondence with M. Ocampo and J. Nelson regarding deposition schedule.	0.30	67.50	
09/07/2018	JLT	Call with opposing counsel regarding deposition schedule; correspondence with J. Nelson.	0.20	45.00	
09/10/2018	JDN	Emails with liability expert D. Tischler; emails with damages expert D. Solis; emails regarding deposition schedule; prepare for lay witness depositions; prepare for Fed. R. Civ. P. 30(b)(6) depositions.	1.80	765.00	
09/10/2018	JLT	Correspondence; review case authority alert.	0.70	157.50	
09/10/2018	JLT	Discussion with J. Nelson regarding next steps; correspondence with M. Ocampo and opposing counsel regarding deposition schedules.	0.40	90.00	
09/11/2018	JDN	Prepare for twelve RF and Flow lay and expert depositions.	1.50	637.50	

09/11/2018	JLT	Correspondence with M. Ocampo and opposing counsel.	0.20	45.00
09/11/2018	JLT	Analyze liability rebuttal expert report; correspondence.	1.80	405.00
09/12/2018	SLK	Prepare reference notebook regarding documents referenced in factual statement for submittal.	1.10	165.00
09/12/2018	JDN	Prepare for twelve RF and Flow lay and expert depositions.	2.10	892.50
09/12/2018	JLT	Correspondence with opposing counsel.	0.10	22.50
09/12/2018	JLT	Correspondence with opposing counsel and M. Ocampo; meeting with J. Nelson to discuss depositions.	0.50	112.50
09/12/2018	JLT	Review statement of facts and exhibits for depositions.	0.70	157.50
09/12/2018	JLT	Correspondence with M. Ocampo and J. Nelson.	0.10	22.50
09/13/2018	JDN	Prepare for and defend C. Cortes's deposition.	5.00	2,125.00
09/13/2018	JDN	Prepare for twelve RF and Flow lay and expert depositions.	2.00	850.00
09/13/2018	JLT	Correspondence with M. Ocampo.	0.10	22.50
09/13/2018	JLT	Review correspondence with M. Ocampo and opposing counsel; review fact book for depositions.	1.10	247.50
09/13/2018	JLT	Call with opposing counsel; correspondence with J. Nelson; review exhibits for deposition.	0.30	67.50
09/13/2018	JLT	Deposition of C. Cortes.	5.50	1,237.50
09/14/2018	JDN	Defend J. Gomez's deposition.	4.00	1,700.00
09/14/2018	JDN	Prepare for ten RF and Flow lay and expert depositions.	2.00	850.00
09/14/2018	JLT	Deposition of J. Gomez.	4.00	900.00
09/14/2018	JLT	Schedule court reporter for depositions; review Flow's objections to 30(b)(6) topics.	1.60	360.00
09/14/2018	JLT	Correspondence with court reporter, J. Nelson, M. Ocampo, and opposing counsel.	0.40	90.00
09/17/2018	JDN	Prepare for J. Gomez, C. Mette, and C. Wakefield depositions.	2.10	892.50
09/17/2018	JLT	Correspondence with M. Ocampo, opposing counsel.	0.20	45.00
09/17/2018	JLT	Meeting with J. Nelson to discuss deposition strategy.	0.30	67.50
09/17/2018	JLT	Review deposition transcript of J. Gomez.	0.80	180.00

09/17/2018	JLT	Review exhibits to identify potential deposition material.	1.30	292.50
09/17/2018	JLT	Call with opposing counsel regarding deposition schedule.	0.10	22.50
09/17/2018	JLT	Correspondence with opposing counsel.	0.20	45.00
09/18/2018	JDN	Prepare for and take depositions of J. Gomez and C. Mette from Flow.	2.80	1,190.00
09/18/2018	JDN	Prepare for C. Wakefield's deposition.	1.40	595.00
09/18/2018	JDN	Skype conference call with Bogota, Columbia co-counsel M. Ocampo to discuss deposition status and strategy.	0.60	255.00
09/18/2018	JLT	Depositions of C. Mette and J. Gomez.	3.00	675.00
09/18/2018	JLT	Correspondence with M. Ocampo and opposing counsel.	0.50	112.50
09/18/2018	JLT	Meeting with J. Nelson to discuss deposition preparation.	0.50	112.50
09/18/2018	JLT	Conference call with M. Ocampo; discussion with J. Nelson and review of documents.	0.80	180.00
09/19/2018	JDN	Prepare and take C. Wakefield's deposition.	2.80	1,190.00
09/19/2018	JDN	Calls and emails with liability expert D. Tischler to prepare for his September 25 deposition.	1.20	510.00
09/19/2018	JLT	Correspondence with M. Ocampo; review translation notes.	0.20	45.00
09/19/2018	JLT	Document review for deposition preparation.	1.60	360.00
09/19/2018	JLT	Deposition of C. Wakefield.	2.90	652.50
09/20/2018	JLT	Correspondence with court reporter and opposing counsel regarding deposition rescheduling.	0.10	22.50
09/20/2018	JLT	Review transcripts of C. Mette and J. Gomez depositions.	0.50	112.50
09/20/2018	JLT	Correspondence with M. Ocampo regarding translation of emails.	0.10	22.50
09/21/2018	JLT	Correspondence with court reporter; review transcript of J. Gomez deposition.	0.70	157.50
09/21/2018	JLT	Deposition preparation and document review.	1.00	225.00
09/23/2018	JLT	Correspondence with court reporter's office.	0.10	22.50
09/24/2018	JDN	Prepare for and attend C. Gomez's deposition; forward post-July 2017 operation logs to D. Solis; emails with D. Solis regarding the same; prepare for D. Tischler and R. Fincher depositions; work on producing RF's maintenance logs.	4.00	1,700.00
09/24/2018	JLT	Deposition of C. Gomez; rescheduling depositions.	3.70	832.50

09/24/2018	JLT	Correspondence with opposing counsel; expert witness deposition preparation; analyze expert reports; discussion with J. Nelson.	0.80	180.00
09/25/2018	JDN	Prepare for and defend D. Tischler's deposition.	4.70	1,997.50
09/25/2018	JLT	Deposition of D. Tischler.	4.70	1,057.50
09/26/2018	SLK	Review client to documents to locate original version of the 2013 business plan.	0.40	60.00
09/26/2018	JDN	Prepare for T. Ruiz's deposition; emails with M. Ocampo; call with D. Solis.	1.20	510.00
09/26/2018	JLT	Call with opposing counsel.	0.30	67.50
09/26/2018	JLT	Correspondence with M. Ocampo, J. Nelson, and S. Kangas.	0.10	22.50
09/27/2018	JDN	Prepare for T. Ruiz's deposition; prepare for J. Ramirez's deposition; emails to expert D. Tischler; call from expert D. Tischler; produce maintenance logs.	1.20	510.00
09/27/2018	JLT	Discussion with J. Nelson; correspondence with court reporter.	0.30	67.50
09/27/2018	JLT	Call with opposing counsel; correspondence with S. Kangas.	0.10	22.50
09/27/2018	JLT	Correspondence with M. Ocampo and opposing counsel.	0.30	67.50
09/27/2018	JLT	Review maintenance logs.	1.90	427.50
09/28/2018	JDN	Defend T. Ruiz and J. Raimirez depositions.	8.00	3,400.00
09/28/2018	JLT	Depositions of T. Ruiz and J. Ramirez.	8.00	1,800.00

PROFESSIONAL SERVICES:

\$38,930.00

SERVICES SUMMARY

<u>TIME</u> <u>KEEPER</u>	<u>NAME</u>	<u>RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
SLK	Shane L. Kangas	150.00	1.50	225.00
JDN	James D. Nelson	425.00	54.70	23,247.50
JLT	Jesse L. Taylor	0.00	0.50	0.00
JLT	Jesse L. Taylor	225.00	68.70	15,457.50
TOTAL FOR SERVICES			125.40	\$38,930.00

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
09/11/2018	Federal Express Corporation 8404-0001 6/25/18 FedEx Delivery to D. Tischler.	34.31
	Photocopies Expense	108.75
TOTAL COSTS ADVANCED:		<u>\$143.06</u>



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Tax ID: 91-1155124

November 6, 2018
Client/Matter No. 8404-0001
Statement No. 539379

Tulio Ruiz
Ruiz Fajardo Ingenieros Asociados, S.A.S.
Calle 104 No. 14A-45
Oficina 304 Centro Empresarial 104
Bogota Colombia

RE: Ruiz Fajardo Ingenieros v. Flow Int'l
Claim No.:

INVOICE FOR PROFESSIONAL SERVICES rendered through October 31, 2018:

<u>DATE</u>	<u>TIME</u> <u>KEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/01/2018	JDN	Work on supplementing RF's liability and damages experts' reports with deposition testimony.	0.60	255.00
10/01/2018	JLT	Meeting with J. Nelson to discuss [REDACTED]; deposition transcripts.	0.20	45.00
10/01/2018	JLT	Correspondence with D. Tischler, D. Solis, and M. Ocampo.	0.60	135.00
10/01/2018	JLT	Research [REDACTED].	1.40	315.00
10/02/2018	JLT	Correspondence with J. Nelson, opposing counsel, and court reporter; review Exhibit 28 (Tischler notes).	0.50	112.50
10/02/2018	JLT	Correspondence with opposing counsel; review [REDACTED].	0.30	67.50
10/03/2018	JLT	Correspondence with M. Ocampo; review deposition testimony of D. Tischler; prepare to respond to summary judgment motion.	2.30	517.50

10/03/2018	JLT	Meeting with J. Nelson to discuss response to summary judgment motion.	0.20	45.00
10/04/2018	JLT	Analyze deposition testimony to incorporate into statement of facts.	1.00	225.00
10/04/2018	JLT	Correspondence with J. Nelson and D. Tischler about supplemental report.	0.20	45.00
10/04/2018	JLT	Analyze deposition testimony of T. Ruiz, J. Gomez, and C. Cortez, record new information, and incorporate deposition testimony into statement of facts.	4.00	900.00
10/04/2018	JLT	Call with D. Tischler regarding expert report; correspondence with J. Nelson regarding same.	0.30	67.50
10/08/2018	JDN	Work on updating D. Tischler and D. Solis's expert reports [REDACTED]	0.40	170.00
10/08/2018	JDN	Work on developing the trial theme [REDACTED] [REDACTED] [REDACTED]	0.60	255.00
10/08/2018	JLT	Correspondence with J. Nelson, M. Ocampo, D. Tischler, and opposing counsel regarding deposition scheduling, supplemental expert reports, and trial preparation.	1.50	337.50
10/08/2018	JLT	Review expert reports to advise D. Tischler.	0.30	67.50
10/09/2018	JDN	Prepare for and attend an extensive Skype conference with T. Ruiz and M. Ocampo to discuss [REDACTED] [REDACTED]	0.90	382.50
10/09/2018	JLT	Correspondence with J. Nelson; edits to statement of facts to incorporate deposition testimony.	1.60	360.00
10/10/2018	JLT	Correspondence with D. Tischler and M. Ocampo.	0.30	67.50
10/10/2018	JLT	Call with J. DeGroot; D. Solis; deposition scheduling.	0.30	67.50
10/10/2018	JLT	Discussion with J. Nelson; review document production and submit documents for translation; correspondence with S. Kangas regarding same.	1.30	292.50
10/11/2018	JDN	Work on liability [REDACTED] [REDACTED]	1.20	510.00
10/11/2018	JLT	Correspondence with J. DeGroot, D. Tischler; update statement of facts; review document production.	1.60	360.00
10/11/2018	JLT	Analyze Supplemental report of D. Tischler; comments and correspondence with D. Tischler regarding same.	3.00	675.00

10/12/2018	JDN	Work on liability [REDACTED] [REDACTED] work on damages [REDACTED] [REDACTED]	2.80	1,190.00	
10/12/2018	JLT	Analyze supplemental report of D. Solis; correspondence with J. Nelson regarding same.	0.50	112.50	
10/12/2018	JLT	Correspondence with D. Solis and J. Nelson regarding finalization of expert report.	0.10	22.50	
10/12/2018	JLT	Correspondence with M. Ocampo and D. Tischler regarding answers to D. Tischler's questions.	0.10	22.50	
10/12/2018	JLT	Correspondence with D. Tischler.	0.10	22.50	
10/12/2018	JLT	Correspondence with opposing counsel; telephone call with D. Tischler.	0.40	90.00	
10/12/2018	JLT	Review supplemental report of D. Tischler; draft comments; compile exhibits; correspondence with J. Nelson and D. Tischler regarding same.	0.80	180.00	
10/13/2018	JLT	Compile Tischler exhibits; correspondence with opposing counsel regarding same.	0.90	202.50	
10/15/2018	JLT	Correspondence with opposing counsel.	0.10	22.50	
10/16/2018	JDN	Call from A. Escobar regarding D. Tischler's supplemental report and email to J. Taylor regarding the same.	0.30	127.50	
10/16/2018	JLT	Correspondence with D. Tischler regarding scheduling depositions; correspondence with J. Nelson and opposing counsel regarding same.	0.20	45.00	
10/16/2018	JLT	Research revocation and breach of warranty claims.	1.20	270.00	Removed half
10/16/2018	JLT	Correspondence with J. DeGroot and D. Tischler regarding rescheduling deposition.	0.10	22.50	
10/17/2018	SLK	Identify additional documents for translation.	0.80	120.00	
10/17/2018	JDN	Analyze dismissing rescission claim with J. Taylor; discuss D. Tischler's deposition with J. Taylor.	0.30	127.50	Removed half
10/17/2018	JLT	Discussion with J. Nelson regarding deposition and expert testimony/strategy; correspondence with D. Tischler and opposing counsel.	0.30	67.50	
10/17/2018	JLT	Deposition preparation; review D. Tischler supplemental report and exhibits.	1.20	270.00	
10/17/2018	JLT	Call with D. Tischler.	0.10	22.50	
10/17/2018	JLT	Correspondence with S. Kangas about Spanish document translation; document review; exhibit organization.	1.50	337.50	
10/18/2018	JDN	Analyze email from M. Ocampo regarding updates to system.	0.20	85.00	

10/18/2018	JDN	Draft mandatory plaintiff's pretrial statement.	0.30	127.50	
10/18/2018	JDN	Prepare for the continuation of liability expert D. Tischler's expert deposition.	0.40	170.00	
10/18/2018	JLT	Correspondence and telephone call with D. Tischler regarding deposition notes; discussion with J. Nelson regarding same; deposition preparation and review of expert reports.	2.00	450.00	
10/18/2018	JLT	Deposition of D. Tischler and correspondence with J. Nelson regarding same.	5.80	1,305.00	
10/19/2018	JLT	Correspondence with D. Tischler.	0.10	22.50	
10/19/2018	JLT	Correspondence and telephone call with opposing counsel regarding expert reports and deposition rescheduling.	0.20	45.00	
10/19/2018	JLT	Correspondence with D. Tischler and opposing counsel regarding deposition rescheduling.	0.20	45.00	
10/19/2018	JLT	Call with D. Tischler.	0.20	45.00	
10/23/2018	JDN	Discuss rescission claim and summary judgment schedule with A. Escobar and J. DeGroot.	0.30	127.50	Removed half
10/23/2018	JLT	Correspondence with opposing counsel, D. Tischler, and J. Nelson concerning deposition schedule.	0.20	45.00	
10/23/2018	JLT	Deposition preparation and deposition of D. Tischler.	1.20	270.00	
10/23/2018	JLT	Call with D. Tischler to recap deposition and discuss next steps.	0.10	22.50	
10/24/2018	JDN	Work on opposition to Flow's motion for summary judgment by analyzing under what circumstances a consequential damages exclusion may survive where a limited repair remedy has failed of its essential purpose.	1.10	467.50	
10/25/2018	JDN	Work on opposition to Flow's motion for summary judgment by analyzing under what circumstances a consequential damages exclusion may survive where a limited repair remedy has failed of its essential purpose.	2.40	1,020.00	
10/25/2018	JDN	Call from J. DeGroot to meet and confer regarding Flow's motion for partial summary judgment and to discuss a potentially sensitive summary judgment motion exhibit.	0.10	42.50	
10/26/2018	JDN	Analyze Flow's motion for partial summary judgment and supporting declaration and begin RF's opposition.	2.40	1,020.00	

10/26/2018	JLT	Review Flow's motion for partial summary judgment; research cited case authority.	6.00	1,350.00
10/29/2018	JDN	Work on RA's opposition to Flow's motion for partial summary judgment.	2.10	892.50
10/29/2018	JDN	Work on liability expert D. Tischler's direct examination.	0.60	255.00
10/29/2018	JDN	Work on damages expert D. Solis's direct examination.	0.50	212.50
10/29/2018	JDN	Work on RA's opening statement and closing argument.	0.70	297.50
10/29/2018	JLT	Analyze summary judgment motion and exhibits; research breach of warranty, consequential damages; draft opposition to motion.	6.50	1,462.50
10/30/2018	JDN	Work on RA's opposition to Flow's motion for partial summary judgment.	0.90	382.50
10/30/2018	JLT	Research express and implied warranties; review deposition transcripts; draft opposition to summary judgment.	6.90	1,552.50
10/31/2018	JLT	Draft J. Nelson declaration; organize exhibits for declaration; correspondence with S. Kangas; edits to opposition motion; review supplemental R. Fincher report.	5.80	1,305.00

PROFESSIONAL SERVICES:

\$22,570.00

SERVICES SUMMARY

<u>TIME</u> <u>KEEPER</u>	<u>NAME</u>	<u>RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
SLK	Shane L. Kangas	150.00	0.80	120.00
JDN	James D. Nelson	425.00	19.10	8,117.50
JLT	Jesse L. Taylor	225.00	63.70	14,332.50
TOTAL FOR SERVICES			<u>83.60</u>	<u>\$22,570.00</u>

COSTS ADVANCED:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
	Photocopies Expense	7.80
TOTAL COSTS ADVANCED:		<u>\$7.80</u>

STATEMENT TOTAL:

\$22,577.80

A black and white photograph of a large, multi-story building with a complex facade, featuring numerous windows and a prominent central section. The building is surrounded by trees and greenery, and a paved area is visible in the foreground.

114



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Tax ID: 91-1155124

December 5, 2018
Client/Matter No. 8404-0001
Statement No. 539683

Tulio Ruiz
Ruiz Fajardo Ingenieros Asociados, S.A.S.
Calle 104 No. 14A-45
Oficina 304 Centro Empresarial 104
Bogota Colombia

RE: Ruiz Fajardo Ingenieros v. Flow Int'l
Claim No.:

INVOICE FOR PROFESSIONAL SERVICES rendered through November 30, 2018:

<u>DATE</u>	<u>TIME</u> <u>KEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
11/02/2018	JDN	Work on RF's opposition to Flow's motion for partial summary judgment.	2.10	892.50
11/02/2018	JLT	Research additional case authority for opposition motion; edits to motion; discussion with J. Nelson regarding opposition to motion.	6.70	1,507.50
11/05/2018	SLK	Review finished translations for accuracy and completion of declaration.	0.20	30.00
11/05/2018	JDN	Work on RF's opposition to Flow's motion for partial summary judgment.	2.40	1,020.00
11/05/2018	JLT	Analyze new translated documents; draft opposition to motion; correspondence with J. Nelson; alterations to declaration of J. Nelson.	3.50	787.50
11/05/2018	JLT	Incorporate edits to opposition draft.	1.90	427.50
11/06/2018	JDN	Work on RF's opposition to Flow's motion for partial summary judgment.	2.10	892.50
11/06/2018	JDN	Draft and revise RF's opposition brief, declaration, and exhibits to Flow's motion for partial summary judgment.	1.60	680.00

11/06/2018	JLT	Research warranty remedies; discussion with J. Nelson; edits to opposition to motion.	4.60	1,035.00
11/07/2018	SLK	Begin preparing exhibits to opposition to motion for summary judgment.	1.30	195.00
11/07/2018	JDN	Work on Ruiz Fajardo's opposition to Flow's motion for partial summary judgment.	5.50	2,337.50
11/07/2018	JDN	Work on planning trial preparation (including deposition excerpts, D. Tischler direct, D. Solis direct, opening, closing, and jury instructions).	0.50	212.50
11/07/2018	JLT	Meeting with J. Nelson to discuss next steps for trial preparation.	0.50	112.50
11/07/2018	JLT	Edits to opposition brief and declaration of J. Nelson; analyze deposition testimony transcripts and note pertinent excerpts.	6.00	1,350.00
11/08/2018	SLK	Finish preparing exhibits to opposition to motion for summary judgment.	1.10	165.00
11/08/2018	SLK	Revise response to defendant's motion for partial summary judgment and complete citations to exhibits.	1.60	240.00
11/08/2018	JDN	Work on RF's opposition to Flow's motion for partial summary judgment.	4.00	1,700.00
11/08/2018	JLT	Edits to opposition motion; extract deposition transcripts; organize exhibits; edits to J. Nelson declaration.	6.70	1,507.50
11/09/2018	JDN	Finalize and file RF's opposition brief, declaration, and exhibits in opposition to Flow's motion for partial summary judgment.	2.00	850.00
11/09/2018	JLT	Discussion with S. Kangas regarding exhibits and opposition.	0.70	157.50
11/12/2018	JDN	Check the "as filed" versions of RF's summary judgment opposition brief, declaration, exhibits, and proposed order for accuracy and determine the appropriate form for Judge Jones's chambers copies.	0.30	127.50
11/12/2018	JLT	Confirm opposition filings with court.	0.30	67.50
11/16/2018	JLT	Analyze Flow's reply brief and exhibits; correspondence with J. Nelson.	0.60	135.00
11/17/2018	JLT	Telephone call with J. Nelson to discuss filing of a praecipe.	0.20	45.00
11/19/2018	SLK	Prepare praecipe to declaration in support of opposition to defendant's motion for summary judgment.	0.20	30.00

11/19/2018	SLK	Identify and prepare additional documents for declaration in support of opposition to defendant's motion for partial summary judgment.	1.30	195.00
11/19/2018	JDN	Analyze Flow's reply in support of its motion for partial summary judgment; create praecipe adding translators' affidavits to J. Nelson declaration exhibits.	1.20	510.00
11/19/2018	JLT	Research, draft, and prepare amended exhibits for praecipe; correspondence with M. Ocampo, S. Kangas, L. Brown, and J. Nelson regarding same.	2.60	585.00
11/19/2018	JLT	Review and analyze Flow's motion for partial summary judgment, reply brief, and corresponding exhibits.	1.80	405.00
11/20/2018	JDN	Continue to analyze Flow's reply in support of its motion for partial summary judgment; continue to create praecipe adding translators' affidavits to J. Nelson declaration exhibits.	0.90	382.50
11/20/2018	JLT	Research local court rules for courtesy pleadings; correspondence with L. Brown to serve hard copies to chambers.	0.60	135.00
11/20/2018	JLT	Review RF's preliminary pretrial statement; draft new pretrial statement.	1.10	247.50
11/20/2018	JLT	Annotate deposition testimony of T. Ruiz.	1.80	405.00
11/21/2018	JDN	Continue to analyze Flow's reply in support of its motion for partial summary judgment.	0.60	255.00
11/21/2018	JLT	Review expert witness questions; review Flow's supplemental motion; analyze translation requirements; analyze motions for summary judgment.	3.60	810.00
11/26/2018	JLT	Correspondence with opposing counsel regarding deposition recordings; analyze Flow's supplemental motion to strike.	0.30	67.50
11/27/2018	JLT	Analyze direct examination templates; correspondence with D. Tischler; review of motions for summary judgment.	3.00	675.00
11/28/2018	JDN	Analyze Flow's surreply in support of its motion to strike.	0.60	255.00

PROFESSIONAL SERVICES:

\$21,432.50

SERVICES SUMMARY

TIME				
<u>KEEPER</u>	<u>NAME</u>	<u>RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
SLK	Shane L. Kangas	150.00	5.70	855.00
JDN	James D. Nelson	425.00	23.80	10,115.00
JLT	Jesse L. Taylor	225.00	46.50	10,462.50
	TOTAL FOR SERVICES		76.00	\$21,432.50

COSTS ADVANCED:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
	Photocopies Expense	13.50
TOTAL COSTS ADVANCED:		<u>\$13.50</u>

STATEMENT TOTAL:

\$21,446.00

The diagram consists of five vertical columns of black rectangles. The columns are connected by horizontal lines at the top and bottom, forming a continuous structure. The rectangles in each column vary in height and width, creating a stepped, architectural appearance. The overall shape is symmetrical, with the central column being the tallest and the outermost columns being the shortest.



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Tax ID: 91-1155124

January 14, 2019
Client/Matter No. 8404-0001
Statement No. 540241

Tulio Ruiz
Ruiz Fajardo Ingenieros Asociados, S.A.S.
Calle 104 No. 14A-45
Oficina 304 Centro Empresarial 104
Bogota Colombia

RE: Ruiz Fajardo Ingenieros v. Flow Int'l
Claim No.:

INVOICE FOR PROFESSIONAL SERVICES rendered through December 31, 2018:

<u>DATE</u>	<u>TIME</u> <u>KEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/03/2018	JLT	Correspondence with opposing counsel and M. Ocampo; edits to pretrial statement; review sample pretrial orders; analyze Flow's answer to complaint.	4.50	1,012.50
12/04/2018	JDN	Work on plaintiff's pretrial statement; prepare for teleconference with opposing counsel; strategy discussions with M. Ocampo.	1.20	510.00
12/04/2018	JLT	Analyze expert report of D. Tischler and draft direct examination questions.	4.50	1,012.50
12/05/2018	JDN	Preparation for and conference call with A. Escobar, J. DeGroot, and A. Walker representing Flow regarding pretrial order process, motions in limine, and deposition videos.	0.60	255.00
12/05/2018	JLT	Conference call with opposing counsel to discuss pretrial motions and deadlines.	0.40	90.00
12/05/2018	JLT	Review correspondence and draft direct examination outlines.	1.50	337.50
12/06/2018	SRJ	Discussion with J. Nelson and J. Taylor regarding case status, depositions, and deadlines for trial preparations.	1.10	302.50

12/06/2018	JLT	Meeting with S. Johnson to discuss summary judgment, next steps.	0.50	112.50
12/07/2018	SRJ	Review summary judgment briefing to determine legal issues likely remaining for trial.	3.30	907.50
12/07/2018	JLT	Correspondence with court regarding courtesy copies of filings.	0.20	45.00
12/08/2018	JDN	Plan Ruiz Fajardo's trial presentation focusing on the T. Ruiz direct examination and the D. Tischler direct examination.	1.20	510.00
12/10/2018	SRJ	Continue to analyze issues to be addressed for trial, including use of deposition videos and proposed changes to deadlines; discussions with J. Nelson regarding same; email correspondence with J. DeGroot regarding schedule changes.	1.70	467.50
12/11/2018	SRJ	Continue to analyze issues to be addressed for trial, including use of deposition videos and proposed changes to deadlines; discussions with J. Nelson regarding same.	1.50	412.50
12/12/2018	SRJ	Continue to analyze issues to be addressed for trial, including use of deposition videos and proposed changes to deadlines; begin to review deposition transcripts for use at trial; discussions with J. Nelson regarding same.	3.70	1,017.50
12/12/2018	JLT	Correspondence with S. Johnson and opposing counsel regarding depositions, video recordings, and expert reports.	0.20	45.00
12/13/2018	SRJ	Continue to analyze issues to be addressed for trial, including motions in limine to prepare for call with opposing counsel; discussions with J. Taylor regarding same.	2.50	687.50
12/13/2018	JLT	Discussion with S. Johnson regarding motions for summary judgment.	0.20	45.00
12/13/2018	JLT	Review sample motions in limine to prepare for discussion with opposing counsel.	1.00	225.00
12/14/2018	SRJ	Continue to analyze issues to be addressed for trial, including motions in limine to prepare for call with opposing counsel; discussions with J. Taylor and J. Nelson regarding same; call with J. DeGroot regarding same; begin to review expert reports in order to determine if we want to exclude any testimony.	5.70	1,567.50
12/14/2018	JDN	Prepare for and attend telephone conference with opposing counsel J. DeGroot to discuss motions in limine.	1.20	510.00

12/14/2018	JLT	Meeting with J. Nelson and S. Johnson to discuss motions in limine.	0.70	157.50
12/14/2018	JLT	Research potential motions in limine.	0.50	112.50
12/14/2018	JLT	Call with opposing counsel to discuss motions in limine; organize and discuss expert reports and strategy with S. Johnson.	1.20	270.00
12/17/2018	SRJ	Continue to analyze issues to be addressed for trial; discussions with J. Taylor regarding pretrial statement revisions; continue to review expert reports in order to determine if we want to exclude any testimony.	4.00	1,100.00
12/17/2018	JLT	Edits to plaintiff's pretrial statement.	1.90	427.50
12/17/2018	JLT	Discuss pretrial statement and next steps with S. Johnson.	0.30	67.50
12/17/2018	JLT	Edits to pretrial statement; organize exhibits for pretrial statement.	3.20	720.00
12/18/2018	SRJ	Continue to analyze issues to be addressed for trial; discussions with J. Taylor regarding pretrial statement revisions; continue to review expert reports and deposition transcripts in order to determine if we want to exclude any testimony; email correspondence with J. DeGroot regarding agreed motions in limine.	6.80	1,870.00
12/18/2018	JDN	Work on RF's response to J. DeGroot's email proposal precluding liability experts from testifying about lost revenues.	0.60	255.00
12/18/2018	JDN	Work on cross examination of Flow's liability expert R. Fincher.	0.30	127.50
12/18/2018	JDN	Work on direct examination of RF's liability expert D. Tischler.	0.30	127.50
12/18/2018	JLT	Meeting with S. Johnson and J. Nelson to discuss motions in limine.	0.50	112.50
12/18/2018	JLT	Travel to DLA Piper and back to collect hard drive containing deposition video recordings.	0.60	135.00
12/18/2018	JLT	Review and organize deposition videos.	0.50	112.50
12/19/2018	SRJ	Continue to analyze issues to be addressed for trial; discussions with J. Taylor regarding pretrial statement revisions, translations and exhibit issues; continue to review expert reports and deposition transcripts in order to determine if we want to exclude any testimony.	6.20	1,705.00
12/19/2018	JLT	Review [REDACTED]	1.40	315.00

12/19/2018	JLT	Edits to plaintiff's pretrial statement; compile exhibits for same; meeting with S. Johnson to discuss outstanding issues with pretrial statement and translation projects.	1.50	337.50
12/20/2018	SRJ	Continue to analyze issues to be addressed for trial; discussions with J. Taylor regarding pretrial statement revisions; translations and exhibit issues; continue to review expert reports and deposition transcripts in order to determine if we want to exclude any testimony.	6.20	1,705.00
12/20/2018	SLK	Begin preparing template of maintenance logs for use in translations.	0.50	75.00
12/20/2018	JDN	Work on plaintiff's pretrial statement; work on obtaining needed translations; work on listing deposition excerpts.	0.60	255.00
12/20/2018	JLT	Edits to pretrial statement exhibits.	1.50	337.50
12/20/2018	JLT	Review Judge Jones' courtroom procedures; call court deputy.	0.30	67.50
12/20/2018	JLT	Meeting with S. Johnson to discuss translation procedures, pretrial statement, and strategy.	0.80	180.00
12/21/2018	SRJ	Continue to analyze issues to be addressed for trial; discussions with J. Taylor regarding pretrial statement revisions, translations and exhibit issues; continue to review deposition transcripts in order to determine what portions of testimony we want to present at trial.	5.60	1,540.00
12/21/2018	JDN	Work on plaintiff's pretrial statement; work on deposition designations; work on trial exhibits/translations.	1.50	637.50
12/21/2018	JLT	Meeting with S. Johnson and J. Nelson to discuss pretrial statement and video depositions.	0.50	112.50
12/21/2018	JLT	Edits to pretrial statement; organization of pretrial statement exhibits and discussion with S. Kangas regarding same.	2.60	585.00
12/24/2018	JDN	Work on J. Gomez (Flow), C. Mette, and J. Gomez (RF) deposition designations.	2.40	1,020.00
12/26/2018	SRJ	Continue to analyze issues to be addressed for trial; discussions with J. Taylor, J. Nelson and S. Kangas regarding pretrial statement revisions, start translations, and exhibit issues; continue to review deposition transcripts in order to determine what portions of testimony we want to present at trial.	6.70	1,842.50
12/26/2018	SLK	Continue preparing pretrial statement and exhibits.	5.90	885.00

12/26/2018	JDN	Discuss our strategy for deposition designations with S. Johnson and J. Taylor.	0.60	255.00
12/26/2018	JDN	Designate portions of J. Ramirez's deposition.	1.50	637.50
12/26/2018	JDN	Designate portions of C. Cortes's deposition.	2.40	1,020.00
12/26/2018	JDN	Designate portions of C. Gomez's deposition.	1.20	510.00
12/26/2018	JLT	Review and note deposition testimony; research and draft proposed jury instructions; meeting with J. Nelson and S. Johnson to discuss deposition testimony and strategy.	5.50	1,237.50
12/27/2018	SRJ	Continue to analyze issues to be addressed for trial; discussions with J. Taylor, J. Nelson, and S. Kangas regarding pretrial statement revisions, start translations, and exhibit issues; continue to review deposition transcripts in order to determine what portions of testimony we want to present at trial; review order granting in part and denying in part defendant's motion for summary judgment; email correspondence with M. Ocampo and T. Ruiz regarding same.	5.00	1,375.00
12/27/2018	SLK	Continue preparing pretrial statement and exhibits.	6.90	1,035.00
12/27/2018	JDN	Designate portions of C. Wakefield's deposition.	0.90	382.50
12/27/2018	JDN	Analyze Judge Jones's order on summary judgment and convey it to T. Ruiz and M. Ocampo.	0.60	255.00
12/27/2018	JDN	Designate portions of T. Ruiz's deposition.	1.80	765.00
12/27/2018	JDN	Review and revise plaintiff's pretrial statement.	1.20	510.00
12/27/2018	JLT	Edits to pretrial statement; organize exhibits to same.	2.80	630.00
12/27/2018	JLT	Analyze court's order granting/denying summary judgment.	0.60	135.00
12/28/2018	SRJ	Continue to analyze issues to be addressed for trial; discussions with J. Taylor, J. Nelson, and S. Kangas regarding pretrial statement revisions, translations, and exhibit issues.	3.50	962.50
12/28/2018	SLK	Finish preparing pretrial statement and exhibits.	6.40	960.00
12/28/2018	JDN	Revise and finalize plaintiff's pretrial statement.	2.40	1,020.00
12/28/2018	JLT	Review pretrial statement; discuss same with S. Johnson.	0.70	157.50
12/31/2018	JDN	Work on RF's proposed jury instructions.	0.60	255.00
PROFESSIONAL SERVICES:				\$39,370.00

SERVICES SUMMARY

TIME				
<u>KEEPER</u>	<u>NAME</u>	<u>RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
SRJ	Shaina R. Johnson	275.00	63.50	17,462.50
SLK	Shane L. Kangas	150.00	19.70	2,955.00
JDN	James D. Nelson	425.00	23.10	9,817.50
JLT	Jesse L. Taylor	225.00	40.60	9,135.00
	TOTAL FOR SERVICES		146.90	\$39,370.00

COSTS ADVANCED:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
12/07/2018	Washington Federal Savings/Card Member Services SLK: 8404-0001 10/31/18 The Word Point - Certified Spanish to English Translator.	838.75
12/27/2018	Solis Financial Forensics 8404-0001 File review/discussion with JDN.	1,200.00
12/27/2018	dtischler Consulting, LLC 8404-0001 Supplemental expert report and depositions.	18,749.27
12/27/2018	Solis Financial Forensics 8404-0001 File review/supplemental analysis and report discussion with J.Taylor.	4,800.00
	Color Document Production	196.00
	Photocopies Expense	183.15
TOTAL COSTS ADVANCED:		\$25,967.17

STATEMENT TOTAL:

\$65,337.17

Age Group	Male (%)	Female (%)
18-24	100	100
25-34	100	100
35-44	100	100
45-54	100	100
55-64	100	100



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Tax ID: 91-1155124

February 13, 2019
Client/Matter No. 8404-0001
Statement No. 540502

Tulio Ruiz
Ruiz Fajardo Ingenieros Asociados, S.A.S.
Calle 104 No. 14A-45
Oficina 304 Centro Empresarial 104
Bogota Colombia

RE: Ruiz Fajardo Ingenieros v. Flow Int'l
Claim No.:

INVOICE FOR PROFESSIONAL SERVICES rendered through January 31, 2019:

<u>DATE</u>	<u>TIME</u> <u>KEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/02/2019	SRJ	Continue to analyze issues to be addressed for trial; discussions with J. Taylor, J. Nelson, and S. Kangas regarding jury instructions, preparing testimony, translations, and exhibit issues; attend court room technology training session.	4.20	1,155.00
01/02/2019	SLK	Finish preparing template of maintenance logs for use by translator.	2.30	345.00
01/02/2019	SLK	Emails with defense counsel regarding exhibits to pretrial disclosure.	0.20	30.00
01/02/2019	JDN	Draft RF's proposed jury instructions.	1.20	510.00
01/02/2019	JDN	Draft T. Ruiz's direct testimony.	4.80	2,040.00
01/02/2019	JDN	Attend mandatory courtroom technology training at U.S. District Court.	1.20	510.00
01/02/2019	JLT	Travel to/from and attend courtroom technology training in preparation for trial.	2.00	450.00
01/02/2019	JLT	Research and draft proposed jury instructions.	6.30	1,417.50

01/03/2019	SRJ	Continue to analyze issues to be addressed for trial; discussions with J. Taylor, J. Nelson, and S. Kangas regarding jury instructions, preparing testimony, translations, and exhibit issues; review and revise jury instructions.	4.00	1,100.00
01/03/2019	SLK	Submittal of translation order and requirements to The Word Point.	0.20	30.00
01/03/2019	JDN	Draft T. Ruiz direct examination.	1.20	510.00
01/03/2019	JDN	Draft D. Tischler direct examination.	1.20	510.00
01/03/2019	JDN	Draft D. Solis direct examination.	1.10	467.50
01/03/2019	JDN	Draft R. Fincher cross examination.	1.30	552.50
01/03/2019	JDN	Draft RF's proposed jury instructions.	1.10	467.50
01/03/2019	JLT	Review direct examination materials and meet with S. Johnson and J. Nelson to discuss.	1.00	225.00
01/03/2019	JLT	Research and draft jury instructions; meet with S. Johnson to discuss same.	6.50	1,462.50
01/04/2019	SRJ	Continue to analyze issues to be addressed for trial; discussions with J. Taylor, J. Nelson, and S. Kangas regarding jury instructions, preparing testimony, anticipated trial length, and deposition video issues; continue to review and revise jury instructions; call with J. DeGroot and A. Escobar regarding trial length; email correspondence regarding same.	6.70	1,842.50
01/04/2019	SLK	Prepare working copy of pretrial statement exhibits.	2.80	420.00
01/04/2019	SLK	Review video transcripts to determine running time per judge's request.	0.60	90.00
01/04/2019	JDN	Work on T. Ruiz direct examination.	5.30	2,252.50
01/04/2019	JDN	Work on RF's proposed jury instructions.	0.30	127.50
01/04/2019	JDN	Work on RF's response to Judge Jones's in-court deputy V. Ericksen's email regarding our prior estimate of five days of trial time.	0.30	127.50
01/04/2019	JLT	Discuss trial timeline with S. Johnson and J. Nelson.	0.50	112.50
01/04/2019	JLT	Research and edit jury instructions; meeting with S. Johnson to discuss same.	3.20	720.00
01/04/2019	JLT	Draft expert report index for D. Tischler.	1.00	225.00
01/05/2019	JDN	Work on T. Ruiz direct examination.	3.00	1,275.00

01/07/2019	SRJ	Continue to analyze issues to be addressed for trial; discussions with J. Taylor, J. Nelson regarding jury instructions, preparing testimony, and deposition video issues; continue to review and revise jury instructions; phone call with J. DeGroot regarding pretrial conference; email correspondence regarding same; begin to prepare index of D. Solis reports.	5.90	1,622.50
01/07/2019	JDN	Prepare index of J. Gomez deposition.	0.90	382.50
01/07/2019	JDN	Prepare index of J. Ramirez deposition.	0.30	127.50
01/07/2019	JDN	Work on T. Ruiz direct examination.	3.90	1,657.50
01/07/2019	JDN	Work on Ruiz Fajardo's proposed jury instructions.	1.10	467.50
01/07/2019	JLT	Revise draft jury instructions.	2.70	607.50
01/07/2019	JLT	Draft index to D. Tischler expert reports; begin to draft index to D. Tishler deposition.	1.30	292.50
01/07/2019	JLT	Discuss jury instructions and verdict form with S. Johnson and J. Nelson; research ninth circuit model instructions and finalize plaintiff's proposed instructions.	2.50	562.50
01/08/2019	SRJ	Continue to analyze issues to be addressed for trial; discussions with J. Taylor, J. Nelson regarding jury instructions, preparing testimony, and deposition video issues; continue to review and revise jury instructions; call with J. DeGroot regarding pretrial conference; email correspondence regarding same; continue to prepare index of D. Solis reports.	6.90	1,897.50
01/08/2019	SLK	Research free video editing software and install.	0.40	60.00
01/08/2019	SLK	Mark designated deposition transcripts of C. Gomez, C. Mette, and F. Javier Gomez for transitions, interlineated objections, extraneous utterances from interpreter, and other items that may affect editing of the video.	0.70	105.00
01/08/2019	SLK	Import and edit video deposition of C. Gomez to isolate clips of designated testimony and prepare storyboard to publish to mp4 for use at trial.	3.10	465.00
01/08/2019	SLK	Import and edit video deposition of C. Mette to isolate clips of designated testimony and prepare storyboard to publish to mp4 for use at trial.	1.40	210.00

01/08/2019	SLK	Import and begin editing video deposition of F. Javier Gomez to isolate clips of designated testimony and prepare storyboard to publish to mp4 for use at trial.	0.20	30.00
01/08/2019	JDN	Analyze photographs of RF's facility in Bogota forwarded by M. Ocampo.	0.30	127.50
01/08/2019	JDN	Work on T. Ruiz direct examination.	4.50	1,912.50
01/08/2019	JDN	Emails to D. Tischler and T. Ruiz about when to travel to Seattle to testify.	0.30	127.50
01/08/2019	JDN	Work on D. Tischler's direct testimony.	0.50	212.50
01/08/2019	JDN	Work on D. Solis's direct testimony.	0.30	127.50
01/08/2019	JLT	Meeting with J. Nelson and S. Johnson to discuss exhibits, trial preparation.	0.50	112.50
01/08/2019	JLT	Discuss exhibits and video deposition clips with S. Kangas.	0.30	67.50
01/08/2019	JLT	Update exhibits to pretrial statement; edits to pretrial statement regarding same; correspondence with opposing counsel regarding same.	0.80	180.00
01/08/2019	JLT	Finish index to D. Tischler reports; draft index to D. Tischler deposition.	4.30	967.50
01/08/2019	JLT	Research and edit jury instructions.	1.50	337.50
01/09/2019	SRJ	Continue to analyze issues to be addressed for trial; discussions with J. Taylor, J. Nelson regarding jury instructions, preparing testimony, and deposition video issues; continue to review and revise jury instructions; continue to prepare index of D. Solis reports.	6.50	1,787.50
01/09/2019	SLK	Continue editing video deposition of F. Javier Gomez to isolate clips of designated testimony and prepare storyboard to publish to mp4 for use at trial.	1.70	255.00
01/09/2019	SLK	Mark designated deposition transcripts of J. Ramirez, C. Cortes, and J. Gomez for transitions, interlineated objections, extraneous utterances from interpreter, and other items that may affect editing of the video.	0.70	105.00
01/09/2019	SLK	Import and edit video deposition of J. Ramirez to isolate clips of designated testimony and prepare storyboard to publish to mp4 for use at trial.	0.70	105.00
01/09/2019	SLK	Import and edit video deposition of C. Cortes to isolate clips of designated testimony and prepare storyboard and publish to mp4 for use at trial.	2.10	315.00

01/09/2019	SLK	Import and edit video deposition of J. Gomez to isolate clips of designated testimony and prepare storyboard and publish to mp4 for use at trial.	3.80	570.00
01/09/2019	SLK	Isolate videotaped depositions from long running videos and publish to mp4.	0.30	45.00
01/09/2019	SLK	Edit video storyboard of C. Mette and publish to mp4.	0.40	60.00
01/09/2019	SLK	Edit video storyboard of C. Gomez and publish to mp4.	0.40	60.00
01/09/2019	SLK	Edit video storyboard of F. Javier Gomez and publish to mp4.	0.40	60.00
01/09/2019	SLK	Edit video storyboard of J. Ramirez and publish to mp4.	0.40	60.00
01/09/2019	SLK	Edit video deposition of F. Javier Gomez to isolate clips of objections to designated testimony.	0.40	60.00
01/09/2019	SLK	Begin editing video deposition of C. Gomez to isolate clips of objections to designated testimony.	0.10	15.00
01/09/2019	JDN	Work on plaintiff's proposed jury instructions.	1.30	552.50
01/09/2019	JDN	Work on T. Ruiz direct examination.	1.40	595.00
01/09/2019	JDN	Work on C. Wakefield cross examination.	1.10	467.50
01/09/2019	JDN	Work on D. Tischler direct examination.	1.00	425.00
01/09/2019	JDN	Work on D. Solis direct examination.	0.90	382.50
01/09/2019	JDN	Work on editing video deposition excerpts.	0.80	340.00
01/09/2019	JLT	Complete index to D. Tischler's deposition and expert reports.	3.00	675.00
01/09/2019	JLT	Meeting with J. Nelson and S. Johnson to discuss final proposed jury instructions and verdict form; edits to same; correspondence with opposing counsel regarding same.	1.30	292.50
01/09/2019	JLT	Review video deposition of C. Gomez.	0.80	180.00
01/09/2019	JLT	Correspondence with M. Norton and S. Johnson regarding technical preparation for trial.	0.20	45.00
01/09/2019	JLT	Correspondence with D. Tischler and M. Ocampo regarding factual developments.	0.30	67.50
01/09/2019	JLT	Correspondence with S. Kangas regarding translations and video depositions.	0.10	22.50
01/09/2019	JLT	Review translated maintenance logs.	0.40	90.00
01/09/2019	JLT	Review video deposition of F. J. Gomez; discussion with S. Johnson.	0.60	135.00

01/09/2019	JLT	Review draft direct examination of T. Ruiz and associated exhibits.	1.00	225.00
01/09/2019	JLT	Review Flow's proposed jury instructions and pretrial statement; research federal rules of evidence.	0.50	112.50
01/10/2019	SRJ	Continue to analyze issues to be addressed for trial; discussions with J. Taylor, J. Nelson regarding jury instructions, responses to exhibit objections, and responses to defendant's objections to designated deposition testimony; review deposition transcripts designated and objected to by defendant, as well as exhibit objections and defendant's pretrial statement.	8.80	2,420.00
01/10/2019	SLK	Prepare Exhibit 42A for production to defendant.	0.10	15.00
01/10/2019	SLK	Review translated documents to identify emails contained within J. Gomez declaration and the Memo re Pending Issues to verify they are included as trial exhibits and determine whether we have included both copies of all translated documents in trial exhibit list.	2.20	330.00
01/10/2019	SLK	Analyze defendant's production to determine whether it produced pretrial exhibits in discovery.	0.90	135.00
01/10/2019	JDN	Work on plaintiff's proposed jury instructions.	0.60	255.00
01/10/2019	JDN	Work on C. Wakefield cross examination.	0.60	255.00
01/10/2019	JDN	Work on T. Ruiz direct examination.	2.40	1,020.00
01/10/2019	JDN	Work on mandatory pretrial order.	0.60	255.00
01/10/2019	JDN	Work on D. Tischler's direct examination .	3.50	1,487.50
01/10/2019	JLT	Meeting with J. Nelson and S. Johnson to discuss pretrial order and defendant's pretrial statement.	0.70	157.50
01/10/2019	JLT	Draft post-argument proposed jury instructions; correspondence with S. Johnson and opposing counsel regarding same.	0.60	135.00
01/10/2019	JLT	Research use of depositions during trial and objections to same.	1.50	337.50
01/10/2019	JLT	Meeting with J. Nelson and S. Johnson to discuss defendant's pretrial statement and objections to same.	2.00	450.00
01/10/2019	JLT	Begin drafting agreed pretrial order.	0.60	135.00
01/10/2019	JLT	Draft direct examination of D. Tischler.	2.50	562.50

01/11/2019	SRJ	Continue to analyze issues to be addressed for trial; discussions with J. Taylor, J. Nelson regarding jury instructions, responses to exhibit objections, and responses to defendant's objections to designated deposition testimony; review deposition transcripts designated and objected to by defendants, as well as exhibit objections and defendant's pretrial statement; attend conference with opposing counsel regarding pretrial statement and exhibits; review draft pretrial order.	6.50	1,787.50
01/11/2019	SLK	Obtain and organize defendant's trial exhibits and videos into electronic trial folder.	0.30	45.00
01/11/2019	SLK	Research annotations found on certain trial exhibits to determine source.	0.50	75.00
01/11/2019	SLK	Continue editing video deposition of C. Gomez to isolate clips of objections to designated testimony.	1.80	270.00
01/11/2019	SLK	Edit video deposition of J. Gomez to isolate clips of objections to designated testimony.	0.50	75.00
01/11/2019	JDN	Work on D. Tischler direct examination.	5.30	2,252.50
01/11/2019	JDN	Prepare for and attend mandatory conference of attorneys with opposing counsel.	2.40	1,020.00
01/11/2019	JLT	Edits to pretrial order.	1.80	405.00
01/11/2019	JLT	Meeting with J. Nelson and S. Johnson to discuss defendant's pretrial statement and objections to same.	1.20	270.00
01/11/2019	JLT	Pretrial conference with opposing counsel.	1.50	337.50
01/11/2019	JLT	Edits to pretrial order; correspondence with S. Johnson regarding same.	2.60	585.00
01/11/2019	JLT	Review deposition designations and objections to same.	0.50	112.50
01/11/2019	JLT	Final edits to proposed pretrial order; compile new exhibits to same; correspondence with opposing counsel regarding same.	1.00	225.00
01/12/2019	JDN	Work on D. Tischler direct examination.	3.40	1,445.00
01/14/2019	SRJ	Continue to analyze issues to be addressed for trial; discussions with J. Nelson regarding D. Tischler testimony; review draft pretrial order, email correspondence with opposing counsel regarding same; continue working on D. Solis direct examination.	6.10	1,677.50

01/14/2019	SLK	Edit video deposition of C. Cortes to isolate clips of defendant's designated testimony and our rebuttal testimony.	1.10	165.00
01/14/2019	SLK	Edit video deposition of C. Gomez to isolate clips of defendant's designated testimony and our rebuttal testimony.	0.70	105.00
01/14/2019	SLK	Edit video deposition of J. Gomez to isolate clips of defendant's designated testimony and our rebuttal testimony.	0.90	135.00
01/14/2019	JDN	Work on D. Tischler direct examination.	4.40	1,870.00
01/14/2019	JDN	Work on T. Ruiz direct examination.	1.20	510.00
01/14/2019	JDN	Work on D. Solis direct examination.	0.60	255.00
01/14/2019	JLT	Edits to pretrial order and correspondence with S. Johnson regarding same.	1.10	247.50
01/14/2019	JLT	Research sample trial briefs and briefs on jury instructions.	1.50	337.50
01/15/2019	SRJ	Continue to analyze issues to be addressed for trial; discussions with J. Nelson and J. Taylor regarding cross examinations and trial briefing; continue working on D. Solis direct examination.	4.90	1,347.50
01/15/2019	SLK	Edit video deposition of F. J. Gomez to isolate clips of defendant's designated testimony and our rebuttal testimony.	0.20	30.00
01/15/2019	SLK	Edit video deposition of C. Mette to isolate clips of defendant's designated testimony and our rebuttal testimony.	0.30	45.00
01/15/2019	SLK	Isolate videotaped depositions from long running videos and publish to mp4 re D. Tischler volumes I-III and T. Ruiz.	0.70	105.00
01/15/2019	JDN	Work on C. Wakefield cross examination.	2.40	1,020.00
01/15/2019	JDN	Work on trial brief in support of RF's proposed jury instructions.	1.20	510.00
01/15/2019	JDN	Work on pocket brief in support of the admission of Exhibits 62-66 based upon the admissions and business records exceptions to the hearsay rule.	0.90	382.50
01/15/2019	JDN	Work on a brief in support of RF's position on the admissibility of the contested depositions designations.	0.70	297.50
01/15/2019	JDN	Work on R. Fincher cross examination.	0.60	255.00
01/15/2019	JDN	Work on L. Barrack cross examination.	0.50	212.50

01/15/2019	JLT	Meeting with J. Nelson and S. Johnson to discuss trial brief, jury instructions, evidence objections, and next steps.	1.00	225.00
01/15/2019	JLT	Research and draft trial brief.	2.50	562.50
01/15/2019	JLT	Draft neutral statement of case for jury instruction.	0.30	67.50
01/15/2019	JLT	Draft trial brief and pocket brief regarding deposition designations.	1.60	360.00
01/15/2019	JLT	Research and draft brief regarding deposition objections.	2.70	607.50
01/16/2019	SRJ	Continue to analyze issues to be addressed for trial; discussions with J. Nelson and J. Taylor regarding direct and cross examinations and trial briefing; continue working on D. Solis direct examination; revise brief on objections to deposition designations; email correspondence with opposing counsel regarding deposition objections; email correspondence with M. Ocampo regarding repair chart questions.	4.50	1,237.50
01/16/2019	SLK	Submit water testing lab results from 2013 to WordPoint for translation.	0.10	15.00
01/16/2019	SLK	Begin integration of all video clips to include: designated testimony, defendant's objections, defendant's designated testimony, and our rebuttal testimony regarding C. Cortes.	1.30	195.00
01/16/2019	SLK	Begin integration of all video clips to include: designated testimony, defendant's objections, defendant's designated testimony, and our rebuttal testimony regarding C. Gomez.	0.60	90.00
01/16/2019	SLK	Begin integration of all video clips to include: designated testimony, defendant's objections, defendant's designated testimony, and our rebuttal testimony regarding F. J. Gomez.	0.40	60.00
01/16/2019	SLK	Begin integration of all video clips to include: designated testimony, defendant's objections, defendant's designated testimony, and our rebuttal testimony regarding C. Mette.	0.70	105.00
01/16/2019	SLK	Begin integration of all video clips to include: designated testimony, defendant's objections, defendant's designated testimony, and our rebuttal testimony regarding J. Gomez.	0.90	135.00
01/16/2019	SLK	Prepare summary email regarding length, status, and outstanding objections of testimony videos.	0.70	105.00

01/16/2019	JDN	Work on C. Wakefield cross examination.	4.40	1,870.00
01/16/2019	JDN	Work on R. Fincher cross examination.	1.20	510.00
01/16/2019	JDN	Work on D. Tischler direct examination.	0.60	255.00
01/16/2019	JDN	Work on D. Solis direct examination.	0.30	127.50
01/16/2019	JLT	Edits to deposition designation brief.	2.30	517.50
01/16/2019	JLT	Edits to Apostille document and correspondence with M. Ocampo and J. Yantz regarding same.	0.20	45.00
01/16/2019	JLT	Discussion with S. Johnson concerning deposition designations; correspondence with S. Kangas regarding missing exhibits.	0.30	67.50
01/16/2019	JLT	Correspondence with M. Ocampo and S. Kangas regarding missing Spanish exhibits.	0.30	67.50
01/16/2019	JAY	Receive letter from Columbia counsel and format for our letterhead and place notary block on it; online lookup for rules, fees and application for Apostille authentication; fill out Apostille authentication application and request check for fees; prepare messenger delivery slip for Secretary of State, Corporations Division - Apostille & Certificate Program; arrange for messenger to take to Secretary of State and obtain Apostille.	1.00	150.00
01/17/2019	SRJ	Continue to analyze issues to be addressed for trial; prepare for and attend pretrial conference; discussions with J. Nelson and J. Taylor regarding direct and cross examinations, trial briefing, and exhibit issues; email correspondence with opposing counsel regarding exhibit objections; email correspondence with M. Ocampo regarding [REDACTED].	4.70	1,292.50
01/17/2019	SLK	Publish integrated videos to mp4 for viewing.	0.80	120.00
01/17/2019	SLK	Prepare trial Exhibits 37B and 40A for production; revise Exhibits 59AB and 61AB; add financial statements to Exhibits 28AB-31AB and 33AB-35AB and update trial exhibit list for all.	1.20	180.00
01/17/2019	SLK	Prepare trial Exhibits for submittal to clerk and judge.	1.90	285.00
01/17/2019	JDN	Prepare for and attend pretrial hearing before Judge R. Jones.	2.40	1,020.00
01/17/2019	JDN	Work on opening statement.	1.20	510.00
01/17/2019	JDN	Work on D. Tischler direct examination.	0.60	255.00
01/17/2019	JDN	Work on C. Wakefield cross examination.	0.60	255.00

01/17/2019	JDN	Work on disputed admissibility of Exhibits 39, 63, and 21 including emails with A. Escobar and J. DeGroot.	1.20	510.00
01/17/2019	JDN	Work on shortening the C. Cortes video deposition excerpts.	1.70	722.50
01/17/2019	JLT	Prepare for pretrial conference.	0.60	135.00
01/17/2019	JLT	Travel to and from district courthouse for pretrial conference.	0.50	112.50
01/17/2019	JLT	Pretrial conference.	1.00	225.00
01/17/2019	JLT	Correspondence with court, S. Johnson, and S. Kangas regarding exhibit handling procedures.	0.20	45.00
01/17/2019	JLT	Analyze and comment on direct examination of D. Solis and cross examination of S. Wakefield.	1.80	405.00
01/17/2019	JLT	Correspondence with J. Yantz, J. Nelson, B. Bakke, and ABC regarding status of Apostille document.	0.70	157.50
01/17/2019	JLT	Correspondence with M. Ocampo regarding Apostille document; scan and mail same.	0.50	112.50
01/17/2019	JLT	Review exhibit list and compile missing and unauthenticated exhibit list.	0.50	112.50
01/17/2019	JLT	Research federal rules of evidence regarding authenticity and admissibility requirements.	1.50	337.50
01/18/2019	SRJ	Continue to analyze issues to be addressed for trial; discussions with J. Nelson and J. Taylor regarding direct and cross examinations, trial briefing, and exhibit issues; email correspondence with opposing counsel regarding jury instructions; email correspondence with M. Ocampo regarding exhibit questions.	6.30	1,732.50
01/18/2019	SLK	Call to courtroom deputy regarding numbering of translated trial exhibits.	0.10	15.00
01/18/2019	SLK	Continue building trial exhibits regarding tab sets and coversheets.	0.70	105.00
01/18/2019	SLK	Per court instructions, prepare electronic exhibit labels and apply to each trial exhibit.	4.60	690.00
01/18/2019	SLK	Email to defense counsel regarding video testimony for review.	0.10	15.00
01/18/2019	JDN	Prepare for and attend conference call with opposing counsel to meet and confer on objections to deposition designations and the admissibility of Exhibits 21, 39, and 60-67.	2.60	1,105.00

01/18/2019	JDN	Prepare for and attend conference call with opposing counsel to meet and confer on objections to proposed jury instructions.	2.40	1,020.00
01/18/2019	JDN	Analyze trial exhibits to accumulate evidence bearing upon the notice issue.	2.70	1,147.50
01/18/2019	JLT	Review defendant's proposed jury instructions.	1.00	225.00
01/18/2019	JLT	Conference call with opposing counsel regarding deposition designations and objections to exhibits; discussion with J. Nelson, S. Johnson, and S. Kangas regarding same.	2.30	517.50
01/18/2019	JLT	Draft memorandum regarding use of emails as business records.	0.80	180.00
01/18/2019	JLT	Call with opposing counsel regarding jury instructions; draft joint jury instructions and joint statement of disputed jury instructions; discussion with S. Johnson and J. Nelson regarding same.	5.00	1,125.00
01/19/2019	SRJ	Continue to analyze issues to be addressed for trial; discussions with J. Nelson and J. Taylor regarding trial briefing and exhibit issues; review and revise trial brief and jury instructions.	1.50	412.50
01/19/2019	JDN	Analyze trial exhibits to accumulate evidence bearing upon the notice issue.	0.90	382.50
01/19/2019	JDN	Work on D. Tischler direct examination.	0.80	340.00
01/19/2019	JDN	Work on C. Wakefield cross examination.	0.40	170.00
01/19/2019	JDN	Work on jury instructions.	0.60	255.00
01/19/2019	JDN	Work on voir dire.	0.30	127.50
01/19/2019	JLT	Edits to defendant's proposed jury instructions.	0.70	157.50
01/19/2019	JLT	Draft trial brief; correspondence with S. Johnson regarding same.	1.20	270.00
01/20/2019	SRJ	Continue to analyze issues to be addressed for trial; discussions with J. Nelson and J. Taylor regarding trial briefing and jury instructions; email correspondence with opposing counsel regarding jury instructions; email correspondence with M. Ocampo regarding exhibit questions; revise neutral statement of the case.	2.50	687.50
01/20/2019	JLT	Correspondence with S. Johnson regarding jury instructions, deposition designations, neutral statement of case, and next steps.	0.50	112.50

01/21/2019	SRJ	Continue to analyze issues to be addressed for trial; discussions with J. Nelson and J. Taylor regarding trial briefing, exhibit issues, and jury instructions; email correspondence with opposing counsel regarding jury instructions; email correspondence with M. Ocampo regarding exhibit questions; revise neutral statement of the case; revise arguments in support of jury instructions.	8.40	2,310.00
01/21/2019	JDN	Work on disputed jury instructions.	1.60	680.00
01/21/2019	JDN	Work on neutral statement of the case.	0.30	127.50
01/21/2019	JDN	Work on compiling exhibits pertinent to the notice issue (Exhibits 6, 8, 11, 21, 23, 38, 69, 70, 71, and 72).	4.80	2,040.00
01/21/2019	JDN	Work on the verdict form.	0.30	127.50
01/21/2019	JLT	Meeting with J. Nelson and S. Johnson to discuss strategy, jury instructions, exhibits, and next steps.	2.00	450.00
01/21/2019	JLT	Research and draft joint statement of disputed instructions.	4.00	900.00
01/21/2019	JLT	Edits to disputed jury instructions, exhibits, verdict form, and trial brief.	1.50	337.50
01/21/2019	JLT	Edits to trial brief and joint statement of disputed instructions.	1.00	225.00
01/22/2019	SRJ	Continue to analyze issues to be addressed for trial; discussions with J. Nelson and J. Taylor regarding trial briefing and exhibit issues, and jury instructions; email correspondence and calls with opposing counsel regarding joint jury instruction and deposition designation filings; email correspondence with M. Ocampo regarding exhibit questions; revise neutral statement of the case; review revised trial brief.	10.30	2,832.50
01/22/2019	SLK	Prepare additional trial exhibits 6A-13A, 23A, 74, and 75.	0.30	45.00
01/22/2019	SLK	Prepare pretrial schedule and instructions for remaining documents.	0.30	45.00
01/22/2019	SLK	Add electronic exhibit labels to new exhibits 6A-13A and 23A.	0.30	45.00
01/22/2019	SLK	Prepare revised copies of trial exhibits 68A and B through 72A and B to include all email attachments.	5.20	780.00

01/22/2019	SLK	Email to D. Tischler regarding additional documents for review.	0.10	15.00
01/22/2019	SLK	Update trial exhibit list to include revised and supplemental exhibits.	0.80	120.00
01/22/2019	SLK	Finalize deposition designations and jury instructions for submittal to court.	1.10	165.00
01/22/2019	SLK	Per judge's instructions, prepare trial document notebook for submittal to chambers.	0.60	90.00
01/22/2019	SLK	Prepare summary of revised and supplemental exhibits regarding update to defense counsel and pretrial order.	0.40	60.00
01/22/2019	SLK	Email exchange with D. McClure regarding supplemental and revised trial exhibits.	0.20	30.00
01/22/2019	JDN	Work on disputed jury instructions.	0.90	382.50
01/22/2019	JDN	Work on D. Tischler direct testimony.	0.90	382.50
01/22/2019	JDN	Work on R. Fincher cross examination.	1.80	765.00
01/22/2019	JDN	Work on trial brief.	0.60	255.00
01/22/2019	JDN	Work on L. Barrack cross examination.	2.40	1,020.00
01/22/2019	JLT	Edits to disputed jury instructions; correspondence with S. Johnson and opposing counsel regarding same.	2.00	450.00
01/22/2019	JLT	Edits to trial brief; correspondence with S. Johnson regarding same.	2.50	562.50
01/22/2019	JLT	Review and propose edits to deposition designations.	0.50	112.50
01/22/2019	JLT	Edits to disputed and agreed jury instructions, deposition designations, trial brief, and correspondence with opposing counsel regarding same.	2.50	562.50
01/22/2019	JLT	Final edits to joint jury instructions, disputed jury instructions, and deposition designations; correspondence with opposing counsel regarding same.	2.50	562.50
01/23/2019	SRJ	Continue to analyze issues to be addressed for trial; discussions with J. Nelson and J. Taylor regarding exhibit issues and video testimony; email correspondence with M. Ocampo regarding exhibit questions and translations; review Flow's objections to jury instructions and trial brief; begin to review formatted deposition videos that will be shown at trial.	8.20	2,255.00

01/23/2019	SLK	Finalize trial document notebook with additional documents for submittal to chambers.	0.60	90.00
01/23/2019	SLK	Continue preparing trial exhibit notebook sets for courtroom clerk and judge.	4.20	630.00
01/23/2019	SLK	Email to defense counsel regarding submittal of final trial exhibits.	0.30	45.00
01/23/2019	JDN	Practice showing video depositions and exhibits in Judge Jones's courtroom.	1.20	510.00
01/23/2019	JDN	Draft T. Ruiz direct examination.	2.40	1,020.00
01/23/2019	JDN	Analyze Judge Jones's final voir dire.	0.30	127.50
01/23/2019	JDN	Organize trial exhibits to be used at trial (2, 6, 8, 11, 21, 38, 39, 62, 63, 65, 67, 68, 70, 71, and 72) according to the problem discussed (start-up, homing, time estimation, and 3D) and by date.	3.80	1,615.00
01/23/2019	JLT	Test exhibits and videos at district court.	1.50	337.50
01/23/2019	JLT	Review and analyze defendant's trial brief and objections to jury instructions.	1.50	337.50
01/23/2019	JLT	Edits to direct examination of T. Ruiz.	0.80	180.00
01/23/2019	JLT	Research federal rules of evidence for submitting charts and summaries.	0.80	180.00
01/23/2019	JLT	Draft and revise statement of revised exhibits; correspondence with court regarding same.	1.00	225.00
01/23/2019	JLT	Watch video deposition of C. Mette for accuracy.	0.30	67.50
01/23/2019	JLT	Correspondence with opposing counsel regarding exhibits.	0.20	45.00
01/24/2019	SRJ	Continue to analyze issues to be addressed for trial; discussions with J. Nelson and J. Taylor regarding exhibit issues and video testimony; meeting with D. Solis to prepare testimony; email correspondence with D. Tischler regarding testimony; continue to review formatted deposition videos that will be shown at trial.	8.60	2,365.00
01/24/2019	SLK	Prepare trial exhibit notebook sets for counsel.	2.80	420.00
01/24/2019	SLK	Obtain and organize defendant's revised trial exhibits and videos into electronic trial folder.	0.10	15.00
01/24/2019	JDN	Meeting with damages expert D. Solis to work on his direct testimony.	2.10	892.50
01/24/2019	JDN	Work on opening statement.	2.50	1,062.50
01/24/2019	JDN	Analyze Flow's trial brief.	0.50	212.50
01/24/2019	JDN	Work on C. Wakefield cross examination.	1.50	637.50

01/24/2019	JDN	Organize trial exhibits to be used at trial (2, 6, 8, 11, 21, 38, 39, 62, 63, 65, 67, 68, 70, 71, 72, and 75) according to the problem discussed (start-up, homing, time estimation, and 3D) and by date and cross reference them with their Spanish language counterparts.	1.10	467.50
01/24/2019	JLT	Review deposition video testimony of C. Gomez and Flow's J. Gomez.	1.90	427.50
01/24/2019	JLT	Meeting with D. Solis to for trial preparation.	2.30	517.50
01/24/2019	JLT	Review video depositions of J. Gomez and Flow's J. Gomez.	2.50	562.50
01/24/2019	JLT	Edits to D. Solis testimony; correspondence with interpreter, S. Johnson, M. Ocampo, and T. Ruiz regarding trial preparation.	1.00	225.00
01/25/2019	SRJ	Continue to analyze issues to be addressed for trial; discussions with J. Nelson and J. Taylor regarding exhibit issues and video testimony; email correspondence with opposing counsel regarding exhibits.	3.50	962.50
01/25/2019	SLK	Review and edit video testimony videos to conform exactly with deposition designations as filed with the court.	4.10	615.00
01/25/2019	SLK	Prepare trial supplies for witness conference room.	0.40	60.00
01/25/2019	SLK	Build backup hard drive and flash drives of electronic depositions and exhibits, trial exhibits, trial documents, and video testimony for use at trial and review by clients.	0.40	60.00
01/25/2019	JDN	Work on opening statement.	2.50	1,062.50
01/25/2019	JDN	Work on T. Ruiz direct examination.	2.30	977.50
01/25/2019	JDN	Organize trial exhibits to be used at trial (2, 6, 8, 11, 21, 38, 39, 62, 63, 65, 67, 68, 70, 71, 72, and 75) according to the problem discussed (start-up, homing, time estimation, and 3D) and by date and cross reference them with their Spanish language counterparts.	2.90	1,232.50
01/25/2019	JLT	Correspondence with opposing counsel regarding interpreter schedule.	0.20	45.00
01/25/2019	JLT	Research case authority on lost profits for new businesses.	1.50	337.50
01/25/2019	JLT	Edits to D. Tischler and D. Solis direct examinations.	1.80	405.00

01/25/2019	JLT	Research case authority regarding disputed jury instructions.	3.50	787.50
01/25/2019	JLT	Transfer and review exhibits and videos for trial.	0.50	112.50
01/26/2019	SRJ	Meeting with T. Ruiz and M. Ocampo to prepare for trial.	6.00	1,650.00
01/26/2019	JDN	Preparation for and meeting with T. Ruiz and M. Ocampo to prepare to trial.	7.00	2,975.00
01/26/2019	JLT	Trial preparation with T. Ruiz and M. Ocampo.	3.00	675.00
01/27/2019	SRJ	Meeting with T. Ruiz and M. Ocampo to prepare for trial; prepare exhibits for opening argument.	7.50	2,062.50
01/27/2019	JDN	Meet with T. Ruiz and M. Ocampo to prepare for trial.	6.00	2,550.00
01/27/2019	JLT	Trial preparation with T. Ruiz, M. Ocampo, S. Johnson, and J. Nelson (review exhibits and testimony).	4.50	1,012.50
01/28/2019	SRJ	Prepare for and attend first day of trial.	10.30	2,832.50
01/28/2019	SLK	Review judge's voir dire questions and prepare chart to track potential jurist responses.	0.70	105.00
01/28/2019	SLK	Revise trial exhibit list to incorporate plaintiff's revised exhibits, track objections to exhibits, and those stipulated for admissibility.	0.30	45.00
01/28/2019	SLK	Prepare reference notebook regarding defendant's trial exhibits.	0.60	90.00
01/28/2019	SLK	Finalize and publish video testimony to reflect judge's orders on objections.	1.50	225.00
01/28/2019	JDN	Trial.	8.00	3,400.00
01/28/2019	JLT	Trial and follow up with clients.	9.50	2,137.50
01/29/2019	SRJ	Prepare for and attend second day of trial; meeting with D. Tischler to prepare for his testimony.	12.00	3,300.00
01/29/2019	JDN	Trial.	8.00	3,400.00
01/29/2019	JLT	Trial.	9.00	2,025.00
01/29/2019	JLT	Trial preparation with D. Tischler.	2.00	450.00
01/30/2019	SRJ	Prepare for and attend third day of trial.	10.40	2,860.00
01/30/2019	JDN	Trial.	8.00	3,400.00
01/30/2019	JLT	Trial.	9.00	2,025.00
01/31/2019	SRJ	Prepare for and attend fourth day of trial.	11.10	3,052.50
01/31/2019	JDN	Trial.	8.00	3,400.00
01/31/2019	JLT	Trial.	9.00	2,025.00

PROFESSIONAL SERVICES:

\$175,367.50**SERVICES SUMMARY**

<u>TIME KEEPER</u>	<u>NAME</u>	<u>RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
SRJ	Shaina R. Johnson	275.00	176.30	48,482.50
SLK	Shane L. Kangas	150.00	72.90	10,935.00
JDN	James D. Nelson	425.00	178.50	75,862.50
JLT	Jesse L. Taylor	225.00	177.50	39,937.50
JAY	Jo A. Yantz	150.00	1.00	150.00
TOTAL FOR SERVICES			606.20	\$175,367.50

COSTS ADVANCED:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
01/07/2019	SoundPath Conferencing 8404-0001 Conference call with J. Nelson on 12.4.18.	2.90
01/16/2019	Secretary of State 8404-0001 1/16/19 Fee for Apostille Authentication.	65.00
01/30/2019	Federal Express Corporation 8404-0001 12/27/18 Shipment of legal documents to D. Tischler in Houston, TX.	38.91
01/30/2019	Federal Express Corporation 8404-0001 1/18/19 Shipment to M. Ocampo Meija of Olano + Ocampo - Bogota, Colombia.	108.23
	Color Document Production	3,436.00
	Photocopies Expense	156.15
TOTAL COSTS ADVANCED:		\$3,807.19

STATEMENT TOTAL:**\$179,174.69**

[REDACTED]

Pre-Bill

Pre-Bill Date: 2/20/2019
Through Date: 2/20/2019
Betts, Patterson & Mines, P.S.

Matter ID 8404-0001
Client Ruiz Fajardo Ingenieros Asociados, S.A.S.
Matter Ruiz Fajardo Ingenieros v. Flow Int'l
Type: Hourly
Bill Freq: Monthly
Opened: 05/10/2016

Edits:
Stmnt No.:
E-bill sent:
Emailed:
Mailed:

Tulio Ruiz
Ruiz Fajardo Ingenieros Asociados, S.A.S.
Calle 104 No. 14A-45
Oficina 304 Centro Empresarial 104
Bogota Colombia

Assigned Type	Initials	Professional Name	Assign %
Attorney	SRJ	Shaina R. Johnson	50.00
Attorney	JLT	Jesse L. Taylor	50.00
Billing	JDN	James D. Nelson	100.00
Legal Assistant	KLP	Karen L. Pritchard	0.00
Legal Assistant	CHD	Cynthia H. Daniel	100.00
Office	SEA	Seattle Office	100.00
Originating	JDN	James D. Nelson	100.00
Responsible	JDN	James D. Nelson	100.00

AR Balance: [REDACTED]

Total Prebill \$89,593.22

Inception to Date Totals

Prior Balance: [REDACTED]

Billed Fees: \$500,980.00

Less Payments: [REDACTED]

Billed Costs: \$17,553.63

Total Due: [REDACTED]

Paid Fees: [REDACTED]

Paid Costs: [REDACTED]

Claim no.:

Timekeeper Summary

Professional	Initials	Hours	Rate	Amount
Shaina R. Johnson	SRJ	49.00	\$275.00	13,475.00
James D. Nelson	JDN	61.00	\$425.00	25,925.00
Jesse L. Taylor	JLT	73.70	\$225.00	16,582.50
Jo A. Yantz	JAY	3.00	\$150.00	450.00
Total		186.70		\$56,432.50

Budget:

Status:

Deductible:

Min bill amt:

Early bill amt:

Bill method: Email

Approved rates:

Ebill client name:

Approved TKs:

Ebill website:

Travel guidelines:

Matter on website:

Auth required:

Copies of costs:

Bill Notes: BB E-MAIL to: tulioruizr@outlook.com

Attach costs at:

Last ebill submit:

Next ebill submit:

A/R Aging

Current

Over 30

Over 60

Over 90

Over 120

Trust AccountBeginning Balance: [REDACTED]

Date	Check No.	Description	Amount
			Ending Balance: [REDACTED]

Professional Fees

Date	Time keeper	Trans No	Task Code	Activity Code	Description	Hours	Rate	Amount
02/01/19	JDN	1887947			Analyze court's draft jury instructions; analyze court's draft verdict form; prepare for D. Solis direct examination; prepare for C. Wakefield, R. Fincher, and L. Barrack cross examinations; prepare for closing argument.	2.00	425.00	850.00
02/01/19	JDN	1887950			Trial.	6.00	425.00	2,550.00
02/01/19	JLT	1889219			Prepare D. Solis to testify; trial.	8.50	225.00	1,912.50
02/01/19	SRJ	1889218			Prepare for and attend fifth day of trial.	9.50	275.00	2,612.50
02/02/19	JDN	1889254			Prepare for C. Wakefield cross examination.	3.00	425.00	1,275.00
02/03/19	JDN	1889288			Prepare for C. Wakefield, R. Fincher, and L. Barrack cross examinations.	4.50	425.00	1,912.50
02/03/19	SRJ	1889401			Continue to prepare for trial by reviewing draft cross examinations.	1.70	275.00	467.50
02/04/19	JDN	1889394			Work on C. Wakefield, R. Fincher, and L. Barrack cross examinations (including conference call with S. Johnson and J. Taylor regarding the same).	2.90	425.00	1,232.50
02/04/19	JDN	1889509			Prepare for closing argument.	3.30	425.00	1,402.50
02/04/19	JLT	1889436			Conference call with J. Nelson and S. Johnson regarding cross examinations.	1.40	225.00	315.00
02/04/19	JLT	1889438			Analyze and comment on cross examination outlines.	2.80	225.00	630.00
02/04/19	JLT	1889440			Draft outline to jury instruction exceptions.	0.40	225.00	90.00
02/04/19	JLT	1889858			Conference call with S. Johnson and J. Nelson regarding closing argument.	0.50	225.00	112.50

02/04/19	SRJ	1889402	Continue to prepare for trial by reviewing draft cross examinations, closing exhibit list, and Flow's expert power points, discussions with J. Nelson and J. Taylor regarding same.	5.10	275.00	1,402.50	
02/05/19	JDN	1890463	Prepare for closing argument.	2.00	425.00	850.00	
02/05/19	JDN	1890464	Trial.	6.00	425.00	2,550.00	
02/05/19	JLT	1889859	Trial preparation and trial.	9.00	225.00	2,025.00	
02/05/19	SRJ	1889856	Prepare for and attend sixth day of trial.	10.10	275.00	2,777.50	
02/06/19	JDN	1890465	Trial.	8.00	425.00	3,400.00	
02/06/19	JLT	1890351	Research and prepare argument regarding lost profits instruction.	3.00	225.00	675.00	
02/06/19	JLT	1890354	Trial.	8.00	225.00	1,800.00	
02/06/19	SRJ	1890370	Prepare for and attend seventh day of trial.	10.00	275.00	2,750.00	
02/07/19	JDN	1890713	Analyze question from the jury; attend hearing on the same; attend court to hear verdict; analyze verdict form and judgment; report to T. Ruiz and M. Ocampo.	2.60	425.00	1,105.00	Discounted to 2.2 hours
02/07/19	JLT	1890690	Trial - appear to hear jury verdict.	1.00	225.00	225.00	
02/07/19	JLT	1890776	Research and draft subpoena concerning attorney fees; correspondence with S. Johnson and K. Bamberger regarding same.	2.00	225.00	450.00	
02/07/19	SRJ	1890432	Discussions with J. Nelson and J. Taylor regarding trial; participate in conference call with court regarding jury questions; return to court for jury verdict; begin to prepare subpoena for opposing counsel attorney's fees to use in preparing our fee petition.	2.00	275.00	550.00	
02/08/19	JDN	1891054	Work on Ruiz Fajardo's petition for an award of attorney's fees.	2.70	425.00	1,147.50	
02/08/19	JLT	1890879	Meeting with T. Ruiz and M. Ocampo to discuss case outcome, attorney fee petition, and appellate process.	0.70	225.00	157.50	Removed

02/08/19	JLT	1891053	Draft subpoena, exhibit to subpoena, interrogatories to flow, letter to DLA Piper regarding attorney fees; draft declaration of J. Nelson in support of fee petition; correspondence with J. Nelson and S. Johnson regarding same.	5.50	225.00	1,237.50
02/08/19	SRJ	1890849	Discussions with J. Nelson and J. Taylor regarding attorney's fee petition and subpoena for opposing counsel's attorney's fees to use in preparing our fee petition.	1.10	275.00	302.50
02/11/19	JDN	1891572	Work on fee petition including letter to A. Escobar requesting DLA Piper's attorney's fees and costs, subpoena to DLA Piper, and request for production to Flow).	1.80	425.00	765.00
02/11/19	JLT	1891493	Research and edits to subpoena, exhibits, RFPs, and letter to DLA Piper.	3.50	225.00	787.50
02/11/19	SRJ	1891301	Discussions with J. Nelson and J. Taylor regarding attorney's fee petition and subpoena for opposing counsel's attorney's fees to use in preparing our fee petition, review letter to A. Escobar requesting billing records.	0.40	275.00	110.00
02/12/19	JAY	1891604	Review email from J. Taylor concerning service of subpoena on A. Escobar; look up address for service and fill out service process form; email to J. Taylor on same; look up registered agent for firm and revise service form; email same to J. Taylor.	0.80	150.00	120.00

Removed

02/12/19	JAY	1891750	Received subpoena from J. Taylor; email to J. Taylor requesting ending service date; upload process service form and subpoena and submit to ABC service; receive production requests for service on counsel; work on process service form; upload process service form and production requests and submit to ABC service; email to J. Taylor to confirm both service orders have been placed; received email confirming service on DLA Piper LLP reg. agent and forward to J. Taylor.	1.10	150.00	165.00	Removed
02/12/19	JDN	1891590	Work on Ruiz Fajardo's petition for an award of attorney's fees and costs and the supporting J. Nelson, M. Ocampo, and P. Vial declarations.	2.60	425.00	1,105.00	
02/12/19	JLT	1891821	Prepare bill of costs and exhibit thereto.	2.50	225.00	562.50	
02/12/19	JLT	1891822	Correspondence with opposing counsel regarding subpoena and RFPs.	0.50	225.00	112.50	
02/12/19	JLT	1891824	Edits to J. Nelson declaration in support of fee petition.	2.50	225.00	562.50	
02/12/19	JLT	1891828	Correspondence with J. Yantz regarding serving subpoena and RFPs.	0.30	225.00	67.50	
02/12/19	JLT	1891829	Correspondence with D. Tischler regarding final invoice.	0.10	225.00	22.50	
02/12/19	JLT	1891830	Research statutory costs compared to contractual recovery of costs.	2.20	225.00	495.00	
02/12/19	SRJ	1891713	Discussions with J. Nelson and J. Taylor regarding attorney's fee petition and subpoena for opposing counsel's attorney's fees to use in preparing our fee petition; review email correspondence with A. Escobar regarding same; review rules regarding cost bills and motions for attorney's fees.	3.00	275.00	825.00	
02/13/19	JAY	1891958	Check on progress of service on registered agent of DLA Piper.	0.10	150.00	15.00	Removed

02/13/19	JAY	1892053	Check on service progress; email to J. Taylor on same showing that no one is responding a company address to process server.	0.20	150.00	30.00	Removed
02/13/19	JAY	1892076	Check status on service on registered agent for DLA Piper; email to J. Taylor letting him know that attempt was done and no one answered at door; review response from J. Taylor; contact ABC and request that they attempt to serve documents for next two days; review email showing serve had been completed this afternoon and forward to J. Taylor.	0.60	150.00	90.00	Removed
02/13/19	JDN	1891940	Draft RF's petition for an award of attorney's fees and costs (including analyzing emails with A. Escobar and redacting invoices to protect the attorney-client privilege).	2.00	425.00	850.00	
02/13/19	JLT	1892091	Review, redact, and comment on all invoices charged to Ruiz Fajardo to date.	3.00	225.00	675.00	
02/13/19	JLT	1892093	Research recovery of foreign attorney fees.	0.50	225.00	112.50	
02/13/19	JLT	1892104	Research recoverability of time spent on fee petitions.	0.50	225.00	112.50	
02/13/19	JLT	1892212	Edits to J. Nelson declaration; draft motion for attorneys' fees and costs; correspondence with J. Nelson and S. Johnson regarding same; edits to invoices; compile expert witness invoices.	3.00	225.00	675.00	
02/13/19	SRJ	1891945	Discussions and correspondence with J. Nelson and J. Taylor regarding attorney's fee petition and need for redaction of invoices; review draft cost bill and exhibits.	0.90	275.00	247.50	
02/14/19	JAY	1892305	Review and download proof of service to the DLA Piper and A. Escobar both dated 2-13-19; save proofs of service in both electronic file and hard copy file.	0.20	150.00	30.00	Removed

02/14/19	JDN	1892467	Call from A. Dagostino of DLA Piper regarding subpoena for DLA's bills; call from A. Escobar of DLA Piper regarding subpoena for DLA's bills; strategy discussions with S. Johnson and J. Taylor regarding subpoena for DLA's bills; continue to work on RF's petition for an award of attorney's fees and costs and the supporting declarations; attend meet and confer conference with A. Escobar regarding RFPs and subpoena; from A. Dagostino of DLA Piper regarding subpoena for DLA's bills.	2.40	425.00	1,020.00
02/14/19	JLT	1892318	Edits to fee petition and J. Nelson declaration.	1.30	225.00	292.50
02/14/19	JLT	1892503	Correspondence with A. Escobar regarding subpoena and protective order; correspondence with J. Nelson and S. Johnson regarding same.	0.20	225.00	45.00
02/14/19	JLT	1892559	Conference call with A. Escobar and J. DeGroot regarding subpoena, RFPs, and attorney fees.	0.50	225.00	112.50
02/14/19	SRJ	1892436	Continue to work on fee petition questions, discussions with J. Nelson and J. Taylor regarding Flow/DLA Piper response to requests for billing information.	1.30	275.00	357.50
02/15/19	JDN	1892802	Work on email to A. Dagostino of DLA Piper; work on RF's petition for attorney's fees.	0.90	425.00	382.50
02/15/19	JLT	1892714	Correspondence with M. Ocampo regarding declaration and invoices.	0.20	225.00	45.00
02/15/19	JLT	1892822	Correspondence with P. Vial and J. Nelson regarding declaration in support of fee petition; organize exhibits and distribute.	0.50	225.00	112.50
02/15/19	JLT	1892880	Edits to fee petition and declaration.	0.80	225.00	180.00

02/15/19	SRJ	1892766	Continue to work on attorney's fee petition and related declarations, discussions with J. Nelson and J. Taylor regarding same.	1.70	275.00	467.50
02/16/19	JDN	1893520	Meet with attorney's fees and costs expert P. Vial.	1.70	425.00	722.50
02/16/19	JLT	1893022	Prepare for and meet with P. Vial and J. Nelson to discuss attorney fee petition and declarations.	2.00	225.00	450.00
02/19/19	JDN	1893697	Work on J. Nelson fee declaration; work on M. Ocampo fee declaration; strategy discussions with S. Johnson.	1.80	425.00	765.00
02/19/19	JLT	1893846	Correspondence with M. Ocampo and S. Johnson regarding attorney fee petition and declaration.	0.20	225.00	45.00
02/19/19	JLT	1893847	Compile exhibits and send to P. Vial for attorney fee petition and declaration.	0.50	225.00	112.50
02/19/19	JLT	1893848	Edits to attorney fee petition and J. Nelson declaration.	1.00	225.00	225.00
02/19/19	JLT	1893931	Discuss fee petition with S. Johnson.	0.30	225.00	67.50
02/19/19	JLT	1894014	Research reasonableness factors for attorney fee awards.	0.50	225.00	112.50
02/19/19	JLT	1894015	Edits to fee petition and declaration; compile exhibits.	2.00	225.00	450.00
02/19/19	SRJ	1893563	Continue to work on attorney's fee petition and related declarations, discussions with J. Nelson and J. Taylor regarding same; email correspondence with M. Ocampo regarding same.	0.90	275.00	247.50
02/20/19	JDN	1894481	Work on fee petition, J. Nelson declaration, P. Vial declaration, and M. Ocampo declaration.	4.80	425.00	2,040.00
02/20/19	JLT	1894423	Edits to fee petition and declaration; draft proposed order.	2.30	225.00	517.50
02/20/19	SRJ	1894332	Continue to revise attorney's fee petition and related declarations, discussions with J. Nelson and J. Taylor regarding same.	1.30	275.00	357.50

Sub-total
Fees: \$56,432.50

Expenses					
Transaction Date	Trans No.	Task Code	Description	Units	Price Amount
02/12/2019	1891849		Solis Financial Forensics 8404-0001 Financial Forensics Expert D. Solis Professional Services 1/21/19 - 2/6/19.	1.00	10,875.00 10,875.00
02/20/2019	1894521		dtischler Consulting, LLC 8404-0001 Review materials, prep for trial, travel to Seattle, Trial time, Direct Examination, Cross-examination, Correspondence with attorneys.	1.00	15,099.36 15,099.36
			Sub-total	2.0000	25974.36
02/06/2019	1894497		Washington Federal Savings/Card Member Services SLK: 8404-0001 1/4/19 The Word Point - Translation of Documents.	1.00	385.16 385.16
02/12/2019	1891846		Maria J. Lucas-Perez 8404-0001 Maria Lucas-Perez Translation services during 1/28/19 and 1/29/19 Witness Trial Testimony.	1.00	1,348.00 1,348.00
02/12/2019	1891841		DLA Piper LLP 8404-0001 Maria Lucas-Perez Translation services and parking during 9/13/2018 - 9/28/18 depositions.	1.00	2,012.00 2,012.00
02/20/2019	1894518		Washington Federal Savings/Card Member Services SLK: 1/16/19 The Word Point: Translation of documents.	1.00	51.00 51.00
			Sub-total	4.0000	3796.16
02/06/2019	1890764		ABC Legal Services, Inc. 8404-0001 12/1018 Deliver Ruiz Fajardo's Opposition to Flow's Motion for Partial Summary Judgment and supporting documents to U.S. District Court.	1.00	15.00 15.00
			Sub-total	1.0000	15.00
02/06/2019	1891802		Byers & Anderson, Inc. 8404-0001 9/19/18 Court reporter fee, Certified Original Transcript of Charlie Wakefield deposition.	1.00	464.15 464.15
02/08/2019	1891806		Byers & Anderson, Inc. 8404-0001 9/13/18 Certified Copy of Transcript of Cesar Cortez deposition.	1.00	354.50 354.50

02/08/2019	1891804	Byers & Anderson, Inc. 8404-0001 9/14/18 Certified Copy of Transcript; Non-Certified Rough Draft of Javier Gomez deposition.	1.00	315.80	315.80
02/12/2019	1891813	Byers & Anderson, Inc. 8404-0001 9/28/18 Certified Copy of Transcript, Rough Draft of Jaimer Ramirez deposition.	1.00	97.00	97.00
02/12/2019	1891837	Byers & Anderson, Inc. 8404-0001 10/23/18 Certified Copy of Transcript, Rough Draft of Dieter Tischler deposition Vol. 3.	1.00	79.30	79.30
02/12/2019	1891778	Byers & Anderson, Inc. 8404-0001 10/18/19 Certified Transcript copy; Exhibits of Dieter Tischler deposition.	1.00	720.05	720.05
02/12/2019	1891815	Byers & Anderson, Inc. 8404-0001 9/28/18 Certified Copy of Transcript, Rough Draft of Tulio Ruiz deposition.	1.00	692.45	692.45
02/12/2019	1891801	Byers & Anderson, Inc. 8404-0001 9/18/18 Court reporter fee, Cert. Original Transcripts of Claudia Mette, Javier Gomez dep.	1.00	419.75	419.75
02/12/2019	1891818	Byers & Anderson, Inc. 8404-0001 9/24/18 Certified Copy of Transcript, Rough Draft of Claudia Gomez deposition.	1.00	232.20	232.20
Sub-total			9.0000		3375.20
			Sub-total		\$33,160.72
			Expenses:		